

JUDGE SWEE

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CARLOS RAY NORRIS,
a/k/a CHUCK NORRIS, an individual,

Plaintiff,

v.

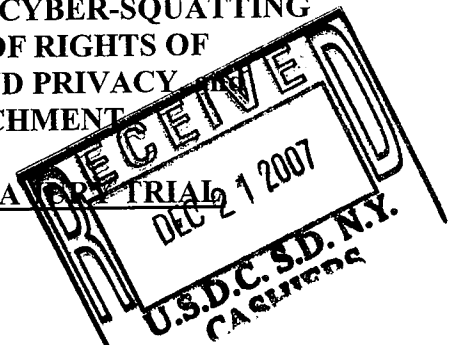
PENGUIN GROUP (USA), INC.,
a Delaware corporation,
IAN SPECTOR, an individual, and
QUBEFACTOR, INC., a New York
Corporation, d/b/a QUBEFACTOR
TECHNOLOGIES,

Defendants.

Civil Action No.

07 CV 11480
COMPLAINT FOR TRADEMARK
INFRINGEMENT, UNFAIR
COMPETITION, FALSE DESIGNATION
OF ORIGIN, FALSE ENDORSEMENT
DILUTION OF A FAMOUS
TRADEMARK, CYBER-SQUATTING
VIOLATIONS OF RIGHTS OF
PUBLICITY AND PRIVACY
UNJUST ENRICHMENT

DEMAND FOR A TRIAL



Plaintiff Carlos Ray Norris a/k/a Chuck Norris ("Mr. Norris" or "Chuck Norris") brings this Complaint against Defendants Penguin Group (USA) Inc. ("Penguin"), Ian Spector ("Mr. Spector"), and QubeFactor Technologies ("QubeFactor") (collectively, "Defendants"). Mr. Norris asserts claims of federal and common law trademark infringement, false endorsement, unfair competition, false designation of origin, dilution of a famous trademark, and violations of anti-cybersquatting law, rights of publicity and privacy, and unjust enrichment. In support of which, Mr. Norris alleges as follows:

I. NATURE OF THE ACTION

1. Mr. Norris brings this action for injunctive relief and damages as a result of Defendants' unauthorized use and exploitation of the "Chuck Norris" name, mark, image and persona in a book entitled "The Truth About Chuck Norris" ("the Book"), and the registration and use of the Internet domain names "truthaboutchucknorris.com" and "truthaboutchuck.com" (the "Domain Names").

Defendants have misappropriated and exploited Mr. Norris's name and likeness without authorization for their own commercial profit, to the harm and diminishment of Mr. Norris's rights to control the commercial use of his name and image. The title of the Book is misleading; the use of Mr. Norris's name in the title and in the Book is likely to confuse and mislead consumers into believing that the Book contains truthful material about Mr. Norris and/or is endorsed or approved by Mr. Norris. By these actions, Defendants seek to trade off and profit from the goodwill associated with Mr. Norris's celebrity status for their own profit.

2. Mr. Norris, through his attorneys, sent Defendants Penguin and Spector "cease and desist" letters warning them of Plaintiff's objections to the use of his name and image in the Book, as part of the Domain Names, and in the Website linked to the Domain Names. Mr. Spector did not respond to Mr. Norris's letters. Penguin responded in letters rejecting Mr. Norris's claims.

3. Mr. Norris accordingly seeks relief from this Court, including a preliminary and permanent injunction enjoining Defendants from using Plaintiff's names and image for commercial purposes and/or in the Domain Name without Plaintiff's consent, and from misleading Plaintiff's fans and the public through the use of Plaintiff's name and likeness.

II. PARTIES

4. Plaintiff Carlos Ray Norris is a resident of Texas. He is a famous actor and author, who is well known under his stage name and trademark "Chuck Norris".

5. Upon information and belief, Penguin is a Delaware Corporation with its principal place of business located at 375 Hudson St., New York, New York 10014. Upon information and belief, Penguin's Gotham Books division is known for publishing non-fiction books. On November 29, 2007, Penguin's Gotham Books division published a book entitled "The Truth About Chuck Norris".

6. On information and belief Defendant Ian Spector, an individual, resides at 31 I U Willets Road, Old Westbury, New York 11568, and is an undergraduate student at Brown University in Providence, Rhode Island. Mr. Spector claims to be the author of the book entitled “The Truth About Chuck Norris”. Upon information and belief, Mr. Spector owns and controls Defendant QubeFactor, and also directly or indirectly controls and manages the Website at 4q.cc (the “Website”). The Website is currently promoting the Book and is available to Internet users worldwide, including in the State of New York.

7. On information and belief, Defendant QubeFactor is a New York corporation with its principal place of business located at 300 Old Country Road, Suite 351, Mineola, NY 11501. Upon information and belief, QubeFactor is owned and controlled by Mr. Spector. QubeFactor is the registrant of the Domain Names “truthaboutchucknorris.com” and “truthaboutchuck.com”. The Domain Names “truthaboutchucknorris.com” and “truthaboutchuck.com” currently link to the Website 4q.cc, and are used to promote the Book.

III. JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction (a) pursuant to 28 U.S.C. § 1332(a)(1) in that the matter in controversy between Mr. Norris and Defendants exceeds \$75,000, exclusive of interest and costs, and is between citizens of different states; (b) pursuant to 28 U.S.C. § 1338 (a) and (b), in that this action arises under the Lanham Trademark Act, 15 U.S.C. §§ 1051 *et seq.*, and in that a claim of unfair competition is joined with a substantial and related claim under the Lanham Trademark Act; and (c) under the doctrines of pendent and supplemental jurisdiction.

9. This Court has personal jurisdiction over Defendant Penguin as its headquarters are located in this District and as Penguin regularly solicits and conducts business in New York.

10. This Court has personal jurisdiction over Defendant Spector as Mr. Spector is domiciled in New York and regularly solicits and conducts business in New York through the Website at 4q.cc and through QubeFactor.

11. This Court has personal jurisdiction over QubeFactor as it is a New York corporation headquartered in the State of New York, and regularly solicits and conducts business in the State of New York.

12. Venue is proper in this judicial district because all three Defendants are residents of the State of New York and because a substantial part of the events or omissions giving rise to the claim occurred in this District, pursuant to 28 U.S.C. § 1391.

IV. FACTS

CHUCK NORRIS'S RIGHTS

13. Mr. Norris is a famous celebrity, actor, and author, and is known world-wide under the name and trademark “Chuck Norris”. Mr. Norris has starred in over twenty films, including *Missing in Action* and *The Delta Force*, and played the leading role in the television show “Walker, Texas Ranger”. Prior to his movie career, he was a six-time undefeated World Professional Middle Weight Karate Champion; in 1997, he became the first man in the Western Hemisphere to be awarded an 8th degree Black Belt Grand Master recognition in the Tae Kwon Do system. He founded the United Fighting Arts Federation, and sponsors the World Combat League, a competitive professional martial arts fighting league. Mr. Norris also is an accomplished author; he has published numerous books, both non-fiction (including “Against All Odds” and his autobiography “The Secret of Inner Strength”, a 1998 New York Times Bestseller) and fiction (“A Threat to Justice” and other “Justice Rider” novels).

14. Mr. Norris has served as a spokesperson for the United Way and has repeatedly visited veterans and active military personnel, including troops in Iraq. He launched a successful program, KickStart, which teaches martial arts to at-risk children as part of their school curriculum. Mr. Norris is often perceived as an embodiment of the All-American success story, and as an example of the rewards of hard work, honesty, and integrity.

15. Mr. Norris uses his name, image, and likeness to promote his professional services, including his acting and martial arts skills, and to endorse merchandise and causes that align with his personal values. Mr. Norris has spent significant amounts of time and effort to develop the goodwill and reputation symbolized by his professional name and trademark "Chuck Norris". As a result of his efforts, Mr. Norris's name, image, and likeness are associated with him and with his approval and efforts.

16. To protect this goodwill and reputation, Mr. Norris is selective about the ways in which he licenses the use of his name and image. He allows his name and image to be used only for causes he supports or products that he has reviewed and approved.

17. Mr. Norris owns numerous registered and common law trademarks, in the United States and elsewhere, along with the goodwill symbolized by such marks (the "Norris Marks"), including the following United States Trademark Registrations:

- a. CHUCK NORRIS (U.S. Reg. No. 2864474)
- b. CHUCK NORRIS (U.S. Reg. No. 2124757)
- c. CHUCK NORRIS FACTS (U.S. Reg. No. 3220186)
- d. CHUCK NORRIS FACTS (U.S. Reg. No. 3213519)
- e. CHUCK NORRIS IS ... "THE FACT" (U.S. Reg. No. 3211054)

Copies of the trademark registrations and status reports from the U.S. Patent & Trademark Office database are attached hereto as Exhibit A.

18. The registrations identified above are valid and subsisting and are *prima facie* evidence of the validity of the registrations, Mr. Norris's ownership of the marks, and his exclusive right to use the marks in commerce in connection with the goods and services specified in the certificates of Registration, pursuant to 15 U.S.C. § 1057(b). These registrations provide constructive notice of Mr. Norris's ownership of those marks, under 15 U.S.C. § 1072.

19. Mr. Norris actively protects his interests in his name and the Norris Marks, and has frequently taken action against misuse of his trademarks, name, and image by unauthorized third parties.

20. As a result of Mr. Norris's substantial use and promotion of his name and image, his name, image, and trademarks are well-known and famous in the United States and throughout the world.

21. Mr. Norris also owns the domain name "chucknorris.com" and maintains a website at www.chucknorris.com. That website includes a biography of Mr. Norris, a roster of his films, and inspirational messages from him to his fans. The chucknorris.com website also offers "Chuck Norris" products and books authored by Mr. Norris. A copy of pages from the "ChuckNorris.com" website is annexed hereto as Exhibit B.

22. Mr. Norris has many loyal fans. They are of critical importance to him, and maintaining their trust and loyalty is a priority for Mr. Norris. These fans, and the public, associate the name "Chuck Norris" with Mr. Norris.

23. In order to protect his rights and also his integrity, Mr. Norris has taken action to halt unauthorized commercial uses of his name and image. For example, Mr. Norris objected to an unauthorized website, formerly linked at "ChuckNorrisFacts.com", which used "Chuck Norris" in

the domain name and advertised unauthorized commercial products using Mr. Norris' name and image. Mr. Norris obtained the domain name and the content of that website from the unauthorized website owner. Mr. Norris still maintains that website, which contains humorous "facts" about Mr. Norris. The authorized "ChuckNorrisFacts.com" website links to another website that is authorized to sell "Chuck Norris" merchandise. The ChuckNorrisFacts.com website also links to sites selling books authored by Mr. Norris and to other sites selling authorized "Chuck Norris" products. A copy of pages from the "ChuckNorrisFacts.com" website is annexed hereto as Exhibit C.

CHUCK NORRIS "FACTS"

24. Around 2005, "Chuck Norris Facts" began to circulate on the Internet and elsewhere. These mythical "facts" associate Mr. Norris's celebrity image with super-human abilities. Some popular examples of these "facts" include:

- a. "Chuck Norris's tears cure cancer. Too bad he has never cried."
- b. "Chuck Norris does not sleep. He waits."
- c. "Chuck Norris is currently suing NBC, claiming Law and Order are trademarked names for his left and right legs."
- d. "The chief export of Chuck Norris is pain."

25. Upon information and belief, this Internet fad began through "facts" relating to another celebrity, Vin Diesel, which were posted on a discussion thread on the Website Somethingawful.com in Spring 2005. These "facts" are the result of contributions by many individual authors and appear on many Internet websites. Upon information and belief, Mr. Spector helped create the Website for 4q.cc, where he published about 700 to 800 of the existing Vin Diesel "facts" and created a forum for Internet users to publish additional Vin Diesel "facts." Upon information and belief, Mr. Spector decided to use Mr. Norris as the subject for these "facts"

in Summer 2005 after conducting a survey from people using his Website. Upon information and belief, these celebrity “facts” are authored by various Internet users and are submitted to Mr. Spector's Website and other Websites and are circulated throughout the Internet. Upon information and belief, Mr. Spector made the computer code that he used to publish these “facts” publicly available. Annexed as Exhibit D are examples from Mr. Spector's Website at 4q.cc.

26. In general, Mr. Norris has not objected to the non-commercial use of his name in connection with “facts” so long as the “facts” are not racist or lewd, and are not likely to tarnish or otherwise harm Mr. Norris's reputation or interests.

27. Mr. Norris does object to unauthorized commercial uses of his name, image and trademarks. He objects in order to maintain his goodwill and reputation, as well as his ability to control the use of his name and image in commercial contexts.

THE INFRINGING DOMAIN NAMES

28. Defendants Mr. Spector and QubeFactor registered the following domain names without Mr. Norris's knowledge or authorization: “truthaboutchucknorris.com” and “truthaboutchuck.com”. These Domain Names use Mr. Norris's name without his authorization.

29. The domain name “truthaboutchucknorris.com” is currently being used to promote sales of the Book “The Truth About Chuck Norris” and has been included in promotional materials for the Book circulated by Gotham, a division of Penguin.

30. The domain names “truthaboutchucknorris.com” and “truthaboutchuck.com” currently link to an advertisement for the Book hosted on Mr. Spector's and QubeFactor's 4q.cc Website. That website publishes other Chuck Norris “facts.” A copy of current pages from the 4q.cc Website, accessed through www.truthaboutchucknorris.com is annexed as Exhibit E. That Website also carries advertising for the Book and other commercial advertisements. The domain names

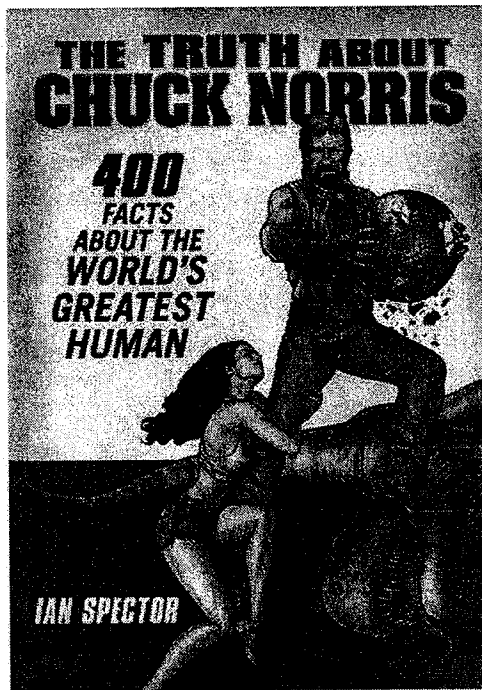
“truthaboutchucknorris.com” and “truthaboutchuck.com” do not link to websites with truthful information about Mr. Norris, but rather to Defendants Spector’s and QubeFactor’s 4q.cc Website, with the fictional statements about Mr. Norris. Mr. Norris has no control over the content contained on the Website reached through the domain names “truthaboutchucknorris.com” or “truthaboutchuck.com”.

THE BOOK

31. Penguin, through its Gotham Books Division, published a book entitled “The Truth About Chuck Norris” (the “Book”) on November 29, 2007.

32. Mr. Spector is identified as author on the cover of the Book. Upon information and belief, Mr. Spector received a significant monetary advance from Defendant Penguin for the Book and is party to a contract pursuant to which he will receive a royalty on sales of the Book.

33. The cover of the Book prominently features Mr. Norris’s name and image. A pre-publication copy of the cover of the Book follows:



The Book consists of a selection of “facts” about Chuck Norris. Although Defendant Penguin’s Gotham Books division is known as a publisher of non-fiction books, there is nothing historical or truthful about the content of the Book, nor is the Book a fictionalized account of Mr. Norris’s life. Some of the “facts” in the Book are racist, lewd, or portray Mr. Norris as engaged in illegal activities. Some of the illustrations in the Book depict Mr. Norris as engaged in callous or unlawful behavior. The Preface of the Book refers to meetings between Mr. Norris and Defendant Spector, and the Afterward thanks Mr. Norris for “playing along.” Excerpts from the Book are attached as Exhibit F.

34. Mr. Norris did not authorize Penguin or its Gotham Books division to use his name, image or likeness in connection with commercial sales of “Chuck Norris Facts” or the Book. The marketing and sale of the Book is a commercial exploitation of Mr. Norris’s name, likeness and goodwill, for Defendants’ own commercial profit.

35. On October 24, 2007, Mr. Norris, through his attorneys, sent a "cease and desist" letter to Defendants Penguin and Mr. Spector, to inform them that that their unauthorized exploitation of his name and image for their own commercial purposes violated his legal rights, as he had not consented to their commercial use of his name and likeness in the Book. A copy of that letter is annexed as Exhibit G hereto.

36. By letter dated October 26, 2007, Penguin Books rejected Mr. Norris's claims. A copy of that letter is annexed as Exhibit H hereto. Mr. Spector never responded to Plaintiff's October 24, 2007 letter.

37. On November 16, 2007, Mr. Norris, through his attorneys, sent another letter to Penguin and Mr. Spector. A copy is annexed hereto as Exhibit I. In that letter, Mr. Norris refuted the arguments made by Penguin and asked for an advance copy of the Book. The letter expressed Mr. Norris's concern over reports that the Book would contain "Chuck Norris facts" that Mr. Spector, in an interview with the Brown Daily Herald, described as "really vulgar" or "hard-core" items. In the interview, Mr. Spector stated:

"I knew I didn't want to include too many vulgar things involving genitalia or infants... Anything that is really vulgar or hard-core probably wasn't approved by me. But if that's what [Penguin] think[s] will sell, it's fine by me."

A copy of the Brown Daily Herald article is annexed to the letter in Exhibit I.

38. Mr. Spector did not respond to counsel's November 16, 2007 letter. Penguin responded promptly by an email, reiterating its prior position. A copy of the November 16, 2007 email response from Penguin to Mr. Norris's attorney Deborah Lodge is annexed as Exhibit J.

39. Defendants never sought or obtained approval from Mr. Norris to use his name and likeness for commercial sales of the Book. Instead, Defendants Penguin and Spector proceeded willfully and intentionally without obtaining consent. Defendants had prior knowledge and notice of the "Chuck Norris" registered trademarks and of Mr. Norris's objections, prior to publication of the Book.

40. On information and belief, the Book is promoted and widely distributed in interstate commerce and sold to consumers through commercial retailers, including Amazon.com, Barnes and Noble, and Books a Million. The Book also is being sold online through websites in other countries, including Japan, France, and England, and likely through retailers in those and other countries. Annex 2 to Exhibit G shows online advertisements for the Book. Consumers who see the advertisements or purchase the Book are likely to recognize the name "Chuck Norris" and associate it with Plaintiff. On information and belief, Defendant Penguin is widely advertising the Book and using Plaintiff's name and image in connection with such advertisements. Among such commercial uses is the video advertisement for the Book on YouTube, posted by "Gothambooks". That commercial uses Mr. Norris's name and likeness in crude drawings to promote commercial sales

41. Defendants have misappropriated and exploited Mr. Norris's name and likeness without authorization for their own profit, to the harm and diminishment of Mr. Norris's rights to control the commercial use of his name, likeness and trademarks. Moreover, sales and promotion of the Book are likely to impede Plaintiff's ability to market his name, likeness and image in connection with "facts" or other products of his choosing.

42. Plaintiff Chuck Norris is concerned that his fans and the public will be misled and deceived by the title of the Book -- "The Truth About Chuck Norris" -- and the domain names "truthaboutchucknorris.com" and "truthaboutchuck.com". Plaintiff Chuck Norris also is concerned that his name and reputation will be tarnished and otherwise harmed by the unauthorized use of his name, image and persona in connection with the Book.

COUNT 1: FEDERAL TRADEMARK INFRINGEMENT – LANHAM ACT § 32

43. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 42 of this Complaint.

44. Defendants' aforementioned acts constitute trademark infringement in violation of 15 U.S.C. § 1114, Lanham Act Section 32.

45. Defendants' wrongful use and misappropriation of the federally registered "Chuck Norris" trademark in commerce, on and throughout the Book, in promotions for the Book, on the Websites, and in the Domain Names "truthaboutchucknorris.com" and "truthaboutchuck.com" are likely to cause confusion, mistake and deception of the public as to the identity and origin of Defendants' Book and Domain Names, or as to the sponsorship or endorsement of the Book and Domain Names by Mr. Norris, in violation of 15 U.S.C. § 1114, Lanham Act Section 32.

46. The above actions by Defendant have caused and will cause great damage to Mr. Norris's business, goodwill, reputation, profits, and the strength of his trademarks. This injury is and, unless enjoined, will continue to be, ongoing and irreparable. An award of monetary damages alone cannot fully compensate Mr. Norris for his injuries and Mr. Norris lacks an adequate remedy at law.

47. Defendants' infringement constitutes a deliberate and willful violation of Mr. Norris's trademark rights, to the harm and diminishment of Mr. Norris's rights to control the commercial use of his name.

48. Accordingly, Mr. Norris is entitled to a preliminary and permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including, but not limited to, compensatory damages, disgorgement of profits, treble damages, and costs and attorney's fees.

COUNT 2: FALSE REPRESENTATION – LANHAM ACT § 43(a)

49. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 48 of this Complaint.

50. Defendants' aforementioned acts constitute false endorsement in violation of 15 U.S.C. § 1125(a), Lanham Act Section 43(a).

51. Defendants' unauthorized publication, promotion, and dissemination of the Book and use and registration of the Domain Names "truthaboutchucknorris.com" and "truthaboutchuck.com" in commerce constitute false and misleading representations that the Book and the Website linked to the Domain Names "truthaboutchucknorris.com" and "truthaboutchuck.com" are sponsored, endorsed and/or authorized by Mr. Norris. The Book's references to meetings between Mr. Norris and Defendant Spector, and the "thanks" given in the Book's Afterward to Mr. Norris for "playing along" also are false and misleading representations that Mr. Norris sponsored, endorsed and/or authorized the Book. Such false and misleading representations are likely to confuse, mislead or deceive consumers as to the affiliation, connection and/or association of Mr. Norris and the Norris Marks with the Book, the Domain Names, and the Website, in violation of 15 U.S.C. § 1125(a), Lanham Act Section 43(a).

52. The above actions by Defendants have caused and will cause great damage to Mr. Norris's `continue to be, ongoing and irreparable. An award of monetary damages alone cannot fully compensate Mr. Norris for its injuries and Mr. Norris lacks an adequate remedy at law.

53. Defendants' unlawful actions constitute deliberate and willful violations of Section 43(a) of the Lanham Act, making this case exceptional within the meaning of 15 U.S.C. § 1117 and § 1118.

54. Mr. Norris is entitled to a preliminary and permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including, but not limited to, compensatory damages, disgorgement of profits, treble damages, and costs and attorney's fees.

COUNT 3 – UNFAIR COMPETITION, FALSE DESIGNATION OF ORIGIN – LANHAM

ACT § 43(a)

55. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 54 of this Complaint.

56. Section 43(a) of The Lanham Act, 15 U.S.C. § 1125(a), prohibits the sale of any goods or services in commerce bearing false designations of origin or false descriptions or presentations of any goods or services in commerce.

57. Mr. Norris uses the Norris Marks, and his name, likeness and image in commerce to identify and distinguish products and services sold or authorized by Mr. Norris.

58. Defendants have wrongfully misappropriated and used Mr. Norris's name, trademarks, likeness, and image in commerce on and in connection with the Book and the Website linked to the Domain Names, and possibly for other purposes, in competition with the products and services sold or authorized by Mr. Norris. Defendants' unauthorized use is likely to confuse and mislead consumers as to the source and sponsorship of the Book, the Domain Names and the Website, in violation of 15 U.S.C. § 1125(a), Lanham Act Section 43(a).

59. Defendants' unauthorized use of the Norris Marks, and Mr. Norris's name, likeness and image in connection with the publication, promotion, and dissemination of the Book and in the Domain Names expressly or impliedly misrepresents that the Book and Websites contain truthful information about Mr. Norris, or that use of the Domain Names will lead to a website containing truthful information about Mr. Norris. Those false and misleading representations are likely to cause confusion, mistake and deception among consumers.

60. Upon information and belief, Defendants' Book contains false representations that it is the owner of the "facts", which will likely confuse, deceive or mislead members of the public into

believing that they or others, including Mr. Norris, cannot circulate or distribute "facts" that are contained in the Book.

61. Defendants' unauthorized actions are likely to harm Plaintiff, to diminish his ability to control the use of the Norris Marks, his name, likeness and image, and to harm his ability to use or authorize the use of the Norris Marks, and his name, likeness and image for "facts" and other goods and services in competition with Defendants' goods and/or services.

62. Defendants' foregoing actions constitute unfair competition, false designation of origin, and false advertising in connection with products and services distributed in interstate commerce, in violation of section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

63. The above actions by Defendants have caused and will cause great damage to Mr. Norris's business, goodwill, reputation, and commercial interests. The injury is and, unless enjoined, will continue to be, ongoing and irreparable.

64. Defendants' actions constitute a deliberate and willful violation of Section 43(a) of the Lanham Act, making this case exceptional within the meaning of 15 U.S.C. §§ 1117 and 1118.

65. Mr. Norris is entitled to a preliminary and permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including, but not limited to, compensatory damages, disgorgement of profits, treble damages, and costs and attorney's fees.

COUNT 4: DILUTION OF FAMOUS MARKS-- LANHAM ACT 43(c)

66. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 65 of this Complaint.

67. Mr. Norris's name and the Norris Marks are famous marks within the meaning of the federal Anti-Dilution Act, 15 U.S.C. § 1125(c).

68. Mr. Norris has no control over the quality of the Book, Defendants' advertising and other promotional materials, the Website, Defendants' use of Mr. Norris's trademarks, or Defendants' other misappropriations of Mr. Norris's name and likeness for their commercial purposes. As a result of Defendants' acts, the distinctive qualities of Mr. Norris's name, marks, and image are likely to be diluted and diminished.

69. Defendants are using and disseminating materials bearing Mr. Norris's famous trademarks, name and likeness in commerce for commercial purposes. Unless enjoined, Defendants' unauthorized actions will continue to dilute and diminish the distinctive nature of Mr. Norris's marks through blurring, in violation of 15 U.S.C. § 1125(c).

70. Similarly, Defendants are using Mr. Norris's famous marks, name and image in an unwholesome or unsavory context, for commercial purposes for their profit. Such unauthorized uses are likely to dilute and diminish the distinctive nature of Mr. Norris's famous marks name and image through tarnishment, in violation of 15 U.S.C. § 1125(c).

71. Defendants' unauthorized misappropriation and wrongful use of Mr. Norris's name and trademarks are causing, and unless enjoined, will continue to cause, irreparable and ongoing damage to the rights of Mr. Norris and to Mr. Norris's business, reputation, and goodwill in the form of (a) loss of income; (b) dilution; (c) interference with Mr. Norris's ability to exploit his own merchandising rights; and (d) impairment of Mr. Norris's goodwill.

72. Defendants' unlawful actions constitute deliberate and willful violations of 15 U.S.C. § 1125(c), making this case exceptional within the meaning of 15 U.S.C. §§ 1117 and 1118.

73. Mr. Norris is entitled to a preliminary and permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including, but not limited to, compensatory

damages, disgorgement of profits, treble damages, destruction and recall of infringing articles, and costs and attorney's fees.

COUNT 5: FEDERAL ANTI-CYBERSQUATTING - LANHAM ACT § 43(d)

74. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 73 of this Complaint.

75. The aforesaid acts and conduct of Defendants are, and unless enjoined, will continue to be, in violation of Section 43(d) of the Lanham Act, 15 U.S.C. § 1125(d).

76. The "Chuck Norris" name and mark were "distinctive" or "famous" at the time Mr. Spector and QubeFactor registered the domain names "truthaboutchucknorris.com" and "truthaboutchuck.com" in May 2007; (2) the Domain Names registered by Mr. Spector and QubeFactor incorporate a name or mark that is identical or confusingly similar to Plaintiff's famous "Chuck Norris" name and mark; and (3) Mr. Spector and QubeFactor registered and are using the Domain Names with a "bad faith intent to profit" from the mark.

77. These acts of Defendants have caused and will continue to cause severe and irreparable harm to Mr. Norris, unless Defendants are preliminarily and permanently enjoined from registering and using the Domain Names.

78. Defendants' unauthorized misappropriation and wrongful use of Mr. Norris's name and trademark in the Domain Names "truthaboutchucknorris.com" and "truthaboutchuck.com" are causing, and unless enjoined, will continue to cause, irreparable and ongoing damage to the rights of Mr. Norris and to Mr. Norris's business, reputation, and goodwill.

79. Defendants' unlawful actions constitute deliberate and willful violation of 15 U.S.C. § 1125(d), making this case exceptional within the meaning of 15 U.S.C. § 1117.

80. Mr. Norris is entitled to a preliminary and permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including, but not limited to, compensatory damages, disgorgement of profits, treble damages, and costs and attorney's fees.

COUNT 6: VIOLATION OF PRIVACY AND PUBLICITY RIGHTS, N.Y. Civ. Rights Law

§§ 50, 51 and Texas Common Law

81. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 80 of this Complaint.

82. Defendants have used, and, unless enjoined, will continue to use, Mr. Norris's name, portrait, and picture for advertising purposes and for purposes of trade in the State of New York without Mr. Norris's written consent, in violation of N.Y. Civ. Rights Laws §§ 50 and 51.

83. By virtue of Mr. Norris's significant expenditures of time, effort and talent, and the widespread recognition of Chuck Norris's celebrity status, Mr. Norris has rights of publicity in his name, image, and likeness.

84. Upon information and belief, Defendants were and are aware that Mr. Norris had not consented to the use of his name or likeness in connection with the Book and the Domain Name. Mr. Norris specifically informed Defendants that he did not consent to the use of his name and likeness. Notwithstanding this notice, Defendants are continuing to use Mr. Norris's name and likeness in advertising and for purposes of trade without his consent. Defendants' use of Mr. Norris's name and likeness are not in connection with newsworthy events, but are for the purpose of trade and commerce, in connection with Defendants' sale and advertising of merchandise.

85. Defendants appropriated Mr. Norris's name and likeness for the value associated with it, and not in an incidental manner or for a newsworthy purpose. In addition to any potential monetary

gain from the sales of the Book, Defendants gained the benefit of a celebrity endorsement without having to obtain consent or to pay for it.

86. Defendants' aforesaid uses of Mr. Norris's name, portrait, and likeness constitute intentional and willful infringements of Mr. Norris's rights of publicity and privacy in violation of NY Civ. Rights Law §§ 50, 51 and Texas common law.

87. Norris has no adequate remedy at law and has suffered, and will continue to suffer, irreparable harm and damage as a result of Defendants' aforesaid acts, which, if not enjoined, will cause continued injury and loss.

88. Mr. Norris is entitled to a preliminary and permanent injunction against Defendants, as well as all other remedies available under New York law, including, but not limited to, compensatory damages and exemplary damages.

COUNT 7: – INJURY TO BUSINESS REPUTATION; TRADEMARK DILUTION – NEW YORK GENERAL BUSINESS LAW § 360-L

89. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 88 of this Complaint.

90. Defendants, through their actions, have created a likelihood of injury to Mr. Norris's business reputation and of dilution of the distinctive quality of the Norris Marks and trade name, in violation of N.Y. Gen. Bus. Law § 360-L.

91. Mr. Norris has no adequate remedy at law and has suffered, and will continue to suffer, irreparable harm and damage as a result of Defendants' aforesaid acts, which, if not enjoined, will cause injury and loss.

COUNT 8: UNFAIR COMPETITION - NEW YORK COMMON LAW

92. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 91 of this Complaint.

93. Mr. Norris owns commercially valuable property rights in his name, image, and likeness and commercial persona, derived through his own skill, experience and labor.

94. Defendants, through their actions, have misappropriated Mr. Norris's property rights, and the reputation and goodwill symbolized thereby, for their own commercial benefit, to the harm of Mr. Norris's ability to control the commercial use of his name and image and to use and authorize others to use those valuable property rights.

95. Mr. Norris has no adequate remedy at law and has suffered, and will continue to suffer, irreparable harm and damage as a result of Defendants' aforesaid acts, which, if not enjoined, will cause injury and loss.

96. Mr. Norris seeks a preliminary and permanent injunction against Defendants, as well as all other remedies available under New York law, including, but not limited to, compensatory damages and exemplary damages.

COUNT 9 - UNJUST ENRICHMENT - NEW YORK COMMON LAW

97. Mr. Norris realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 96 of this Complaint.

98. Defendants, through their actions and for their own commercial benefit, have appropriated Mr. Norris's persona, goodwill and reputation without his consent, thereby obtaining a benefit that in equity and good conscience they should not have obtained or possessed because it rightfully belongs to Mr. Norris. Defendants have been enriched at Plaintiff's expense under such circumstances that in equity and good conscience they ought not to retain.

99. Mr. Norris seeks a preliminary and permanent injunction against Defendants, as well as all other remedies available under New York law, including, but not limited to, compensatory damages, attorneys fees, and exemplary damages.

DEMAND FOR RELIEF

WHEREFORE, Mr. Norris requests the following relief:

1. For judgment that:

- a. Defendants have engaged in trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114;
- b. Defendants have engaged in unfair competition, false endorsement, false designation of origin, and trademark infringement, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a);
- c. Defendants have engaged in trademark dilution in violation of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c) and the laws of the State of New York;
- d. Defendants QubeFactor and Mr. Spector have engaged in cybersquatting in violation of Section 43(d) of the Lanham Act, 15 U.S.C. § 1125(d);
- e. Defendants have violated Mr. Norris's rights of privacy and publicity in violation of New York Civil Rights Law §§ 50, 51 and Texas common law;
- f. Defendants have engaged in injury to business reputation and trademark dilution in violation of the laws of the State of New York; and
- g. Defendants are unjustly enriching themselves at the expense of Plaintiff, in violation of New York common law; and
- f. Defendants are jointly and severally liable for each and every of the aforesaid violations of law.

2. For a preliminary and permanent injunction enjoining Defendants, and any successors or assigns, and their officers, directors, partners, agents, subcontractors, manufacturers, distributors, retailers, servants, employees, attorneys, affiliates, licensees, subsidiaries and related companies or entities, and all others acting in concert or participation with them, from

- a. Making any unauthorized use of the Norris Marks, or Chuck Norris's name, image or likeness, or any mark or name confusingly similar thereto, for commercial or trade purposes, including but not limited to use in connection with the sale, publication or promotion of the Book;
- b. Making any use (including continued registration) of the Domain Names or any other domain name incorporating any of the Norris Marks or otherwise referring to Plaintiff;
- c. Further publication, sales, distribution, advertising, or promotion of the Book and requiring Defendants to recall, repurchase, or otherwise obtain all unsold copies of the Book that have been distributed, delivered, sold or otherwise provided to wholesale distributors or retail merchants;
- d. Making any misrepresentations or misleading statements concerning Plaintiff, and/or endorsements or approval by Plaintiff of any goods or services sold or distributed in commerce by or on behalf of any Defendant; and
- e. Assisting, aiding or abetting any other person or entity to engage in or perform any of the activities referred to herein.

3. For an order awarding Mr. Norris: (a) Defendants' profits, trebled, together with attorneys' fees and costs, to the full extent provided for by 15 U.S.C. § 1117, Section 35 of the Lanham Act; (b) attorneys' fees under New York General Business Law § 349; and (c) actual and punitive damages as provided for under 15 U.S.C. § 1117, Section 35 of the Lanham Act, relevant New York statutes

and the common law, and holding all Defendants jointly and severally liable for said damages;
impoundment and destruction of all copies of the Book under 15 U.S.C. § 1118;

4. For an order that the Infringing Domain Names be transferred to Mr. Norris without further consideration;

5. For an order requiring Defendants to account to Mr. Norris for Defendants' unjustly received profits resulting from the foregoing acts;

6. For an order declaring that the commercial exploitation of the "facts" using Mr. Norris's name or identity is unlawful;

7. For an order requiring all copies of the Book to be delivered to the Court or other secure place for impoundment and destruction; and

8. For such other and further relief as the Court deems just and proper.

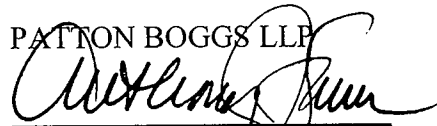
DEMAND FOR A JURY TRIAL

Mr. Norris demands a jury trial on all counts.

DATED: December 21, 2007

Respectfully submitted,

PATTON BOGGS LLP



Anthony Laura AL-3091

Deborah M. Lodge DL-8774

1675 Broadway, 31st Floor
New York, NY 10019-5820
(646) 557-5100

2550 M Street NW
Washington, D.C. 20037
202-457-6000
Fax: 202-457-6315

E-mail: dlodge@pattonboggs.com
alaura@pattonboggs.com

Attorneys for Plaintiff Carlos Ray Norris, a/k/a Chuck Norris

EXHIBIT A

EXHIBIT A

UNITED STATES TRADEMARK REGISTRATIONS

**CHUCK NORRIS
CHUCK NORRIS FACTS**

Int. Cl.: 41

Prior U.S. Cls.: 100, 101 and 107

United States Patent and Trademark Office

Reg. No. 2,864,474

Registered July 20, 2004

**SERVICE MARK
PRINCIPAL REGISTER**

CHUCK NORRIS

NORRIS, CARLOS RAY (UNITED STATES INDIVIDUAL)

C/O TOP KICK PRODUCTIONS
18653 VENTURA BLVD., SUITE 751
TARZANA, CA 913564174

FIRST USE 0-0-1973; IN COMMERCE 0-0-1973.

OWNER OF U.S. REG. NOS. 1,413,462, 2,124,757
AND OTHERS.

FOR: ENTERTAINMENT SERVICES, NAMELY PERSONAL APPEARANCES AND LIVE PERFORMANCES BY A MOVIE STAR AND ACTOR; SCRIPT-WRITING, DIRECTING AND PRODUCTION OF MOTION PICTURES; ONLINE INFORMATION SERVICES RELATING TO ENTERTAINMENT PRODUCTIONS, MARTIAL ARTS, ANTI-DRUG AND MAXIMIZATION OF LIFE OPPORTUNITIES AND PHILOSOPHIES, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

CARLOS RAY NORRIS, WHOSE TRADE NAME IS "CHUCK NORRIS", CONSENTS TO THE REGISTRATION OF HIS NAME AS A SERVICE MARK.

SER. NO. 76-511,481, FILED 5-6-2003.

KARANENDRA S. CHHINA, EXAMINING ATTORNEY

Int. Cl.: 41

Prior U.S. Cls.: 100, 101 and 107

United States Patent and Trademark Office

Reg. No. 2,124,757

Registered Dec. 30, 1997

**SERVICE MARK
PRINCIPAL REGISTER**

CHUCK NORRIS

**NORRIS, CHUCK (UNITED STATES CITIZEN)
RT 3, BOX 31
NAVASOTA, TX 77868**

**FIRST USE 1-1-1977; IN COMMERCE
1-1-1977.**

**FOR: PROVIDING MARTIAL ARTS TRAIN-
ING SERVICES, IN CLASS 41 (U.S. CLS. 100, 101
AND 107).**

SER. NO. 75-032,188, FILED 12-11-1995.

STEVEN R. FINE, EXAMINING ATTORNEY

Int. CL: 35

Prior U.S. Cls.: 100, 101 and 102

United States Patent and Trademark Office

Reg. No. 3,213,519

Registered Feb. 27, 2007

**SERVICE MARK
PRINCIPAL REGISTER**

CHUCK NORRIS FACTS

NORRIS, CARLOS RAY (UNITED STATES INDIVIDUAL)
C/O MICHAEL FORSHEY, PATTON BOGGS LLP
2001 ROSS AVENUE., #3000
DALLAS, TX 75201

FOR: ONLINE RETAIL STORE SERVICES FEATURING CLOTHING, MUGS, MESSENGER BAGS, MOUSEPADS, AND ACCESSORIES, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 2-13-2006; IN COMMERCE 2-13-2006.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NO. 2,864,474.

SER. NO. 78-905,038, FILED 6-9-2006.

LINDA M. KING, EXAMINING ATTORNEY

Int. Cl.: 35

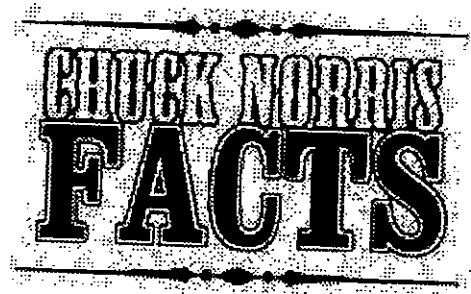
Prior U.S. Cls.: 100, 101 and 102

United States Patent and Trademark Office

Reg. No. 3,220,185

Registered Mar. 20, 2007

**SERVICE MARK
PRINCIPAL REGISTER**



NORRIS, CARLOS RAY (UNITED STATES INDIVIDUAL)
C/O MICHAEL FORSHEY, PATTON BOGGS LLP
2001 ROSS AVENUE, #3000
DALLAS, TX 75201

FIRST USE 2-13-2006; IN COMMERCE 2-13-2006.

OWNER OF U.S. REG. NO. 2,864,474.

FOR: ONLINE RETAIL STORE SERVICES FEATURING CLOTHING, MUGS, MESSENGER BAGS, MOUSEPADS, AND ACCESSORIES, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

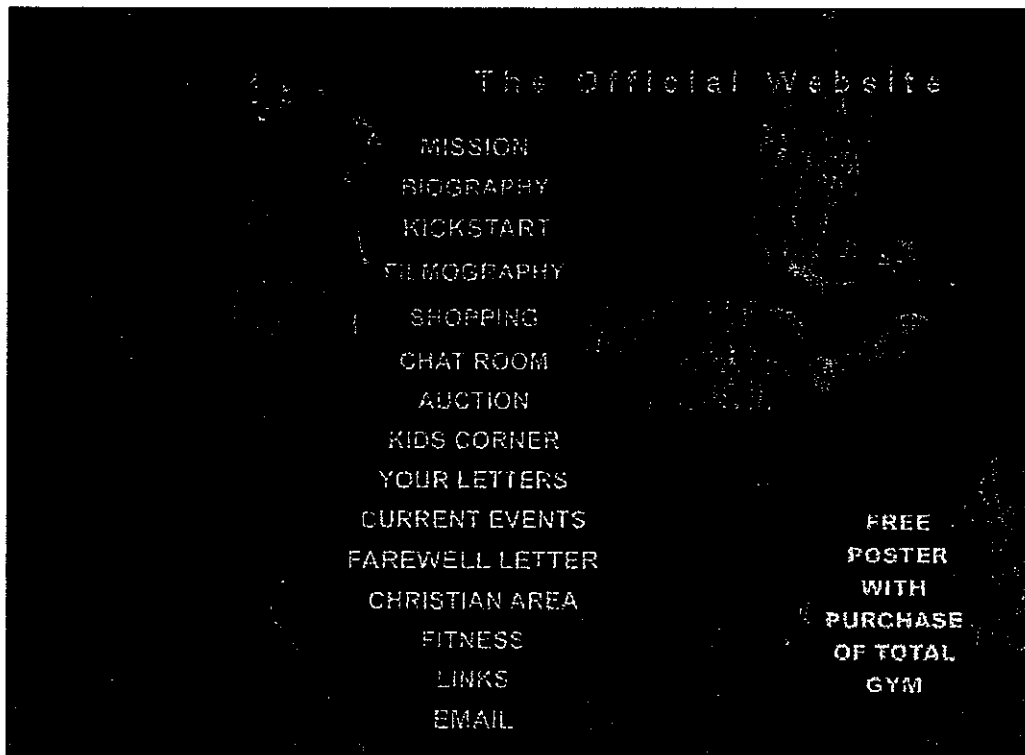
SER. NO. 78-904,982, FILED 6-9-2006.

LINDA M. KING, EXAMINING ATTORNEY

EXHIBIT B

EXHIBIT B


Sample Website Pages from Chucknorris.com



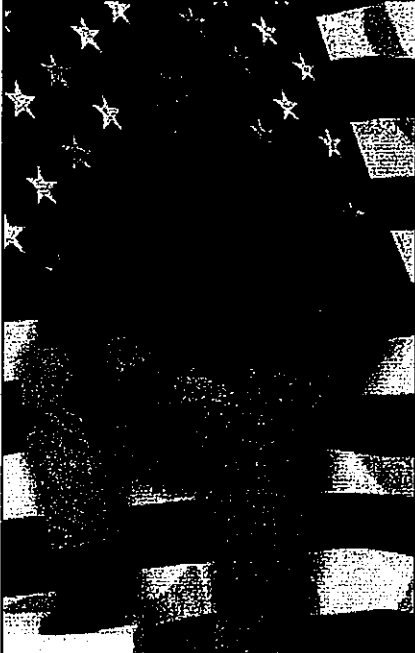
Click here to read Chuck's "Farewell to Walker" letter to the fans.

CHUCK NORRIS.com

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BIOGRAPHY



Chuck Norris Biography

When you think of Chuck Norris, you either immediately think action movie star (recalling his numerous feature films) or television star, for his long-running CBS television series, "Walker, Texas Ranger."

But prior to that, Chuck was a martial arts star, winning many martial arts championships including being a six-time undefeated World Professional MiddleWeight Karate Champion. Chuck was also a renowned teacher in the martial arts. Some of his students were Steve McQueen, Bob Barker, Priscilla Presley and Donnie & Marie Osmond.

From 1964 to 1968, Chuck won many State, National, and International amateur karate titles. In 1968, Chuck fought and won the World Professional MiddleWeight Karate championships by defeating the World's Top Fighters. He held that title until 1974 when he retired undefeated.

In 1968, Chuck was inducted into the Black Belt Hall of Fame as Fighter of the Year. In 1975, he was inducted as Instructor of the Year and in 1977, Chuck received the honor of Man of the Year.

Chuck is also founder and President of United Fighting Arts Federation with over 2,300 black belts all over the world.

In 1997, Chuck achieved another milestone in his life by being the first man ever in the Western Hemisphere to be awarded an 8th degree Black Belt Grand Master recognition in the Tae Kwon Do system. This was a first in 4,500 years of tradition.

Chuck's intense drive and determination extended beyond his martial arts and acting career. He became an offshore powerboat racer with speeds of 140 miles per hour. In 1991, Chuck with his team and sponsor "Popeye Chicken" won the World Off Shore Powerboat championships. Then he went on to setting a new world record by racing a 38 foot Scarab boat 605 miles across the Great Lakes, from Chicago to Detroit, in 12 hours and 8 minutes.

In 1988, Chuck wrote his autobiography, "The Secret of Inner Strength", for Little Brown Publishing, which became a New York Times Best Seller. He followed up a few years later with a second

book, "The Secret Power Within: Zen Solutions to Real Problems", also with Little Brown Publishing.

Chuck was asked how he would like to be remembered. Chuck's answer was as a Humanitarian. He has gotten a good start by:

- 1.) Being the spokesperson for United Way, doing an eight-minute commercial, which helped bring in over two billion dollars.
- 2.) Veterans Administration spokesperson visiting over 12 V.A. hospitals and speaking with World War II, Korean and Vietnam War Veterans including one from World War I.
- 3.) Winning the 1998 Epiphany award on Walker, Texas Ranger for the best Christian program.
- 4.) The Jewish Humanitarian Man of the Year Award.
- 5.) Actively involved with the Make A Wish Foundation for 20 years by making dreams come true for terminally ill children.
- 6.) BMI Music Television Award for Walker, Texas Ranger theme song, "Eyes of a Ranger".
- 7.) Texas Ranger Hall of Fame.
- 8.) Commissioned Police Officer for Terrell, Texas.
- 9.) Motivational speaker for many Christian ministries, such as T.D. Jakes Ministry, Trinity Broadcasting, and Bill Glass Crusade.

But Chuck thinks his most rewarding accomplishment was the creation of his Kick-Start Foundation. With the help of President George Bush, Chuck implemented a program teaching the martial arts to 150 high-risk children at M C Williams Middle School in Houston, Texas, as part of the school curriculum. The program was so successful in helping these kids raise their self-esteem and instilling discipline and respect, as well as getting them out of gangs, that the program is now in 30 schools with over 4,200 young boys and girls actively participating.

[Click here to view photos of Chuck's early life.](#)

CHUCK NORRIS.com

FILMOGRAPHY

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FREE PORTER
WITH PURCHASE OF
THE TOTAL GYM


Chuck Norris Filmography

The Wrecking Crew - 1969 (appeared in)
Return Of The Dragon - 1973 (feature film debut)
Breaker! Breaker! - 1976
Good Guys Wear Black - 1977
A Force Of One - 1978
The Octagon - 1979
An Eye For An Eye - 1980
Silent Rage - 1981
Forced Vengeance - 1981
Lone Wolf McQuade - 1982
Missing In Action - 1984
Missing In Action II: The Beginning - 1985
Code Of Silence - 1985
Invasion USA - 1985
Delta Force - 1986
Firewalker - 1986
Braddock: Missing In Action III - 1987
Hero And The Terror - 1988
Delta Force 2: Operation Stranglehold - 1990
The Hitman - 1991
Sidekicks - 1993
Hellbound - 1994
Top Dog - 1995
Forrest Warrior - 1995 (released on video only)

Television Series

Walker, Texas Ranger - 1993 to 2001

CHUCK NORRIS.com




CHUCK NORRIS

MISSION

- MISSION
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- KICKSTART
- FILMOGRAPHY
- SHOPPING
- CHAT ROOM
- AUCTION
- KIDS CORNER
- CURRENT EVENTS
- FAREWELL LETTER
- CHRISTIAN AREA
- FITNESS
- LINKS
- EMAIL

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The purpose of this web site is to inform and inspire Chuck Norris fans all over the World.

The site's mission is to keep fans up to date on the latest happenings and events plus heighten the awareness of the Kick Start Foundation.

CHUCK NORRIS.com

KICK START

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- AUCTION
- KIDS CORNER
- CURRENT EVENTS
- FAREWELL LETTER
- CHRISTIAN AREA
- FITNESS
- LINKS
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Chuck Norris
Chairman and Founder
www.kick-start.org

Dear Friends,

When I founded Kick Drugs Out of America in 1990, my primary focus was helping youngsters resist drug-related peer pressures through martial arts training. Of course I understood that the comprehensive benefits to martial arts training far exceed preventing drug use...but that was my primary concern and certainly a major concern for our country.

Within a couple of years of implementation, it became quite clear from evaluation that the impact of the program was much more than helping youngsters resist drugs. Today, our organization is a character building, life-skills program whose fundamental purpose is to give our students the tools to strengthen their self image. When a child develops a strong sense of self-awareness and inner strength, they are able to resist peer pressure including drug and alcohol use and involvement in gangs.

In addition, martial arts training provides them with the core values and philosophies associated with leading a productive and healthy life. That is what we are all about...to give every child a chance for a productive life in which they CAN achieve their goals and dreams. Our current name, while it has served us well, implies too narrow a focus for all that we are accomplishing.

Therefore, we are changing our name to KICK START, which we believe more accurately describes our mission. With our new name and a new marketing focus, we hope to reach more children, which will increase our impact upon the youth of our country.

As always, please know how much your continued support means to me and all of our "karate kids". Now, more than ever, we need you to give every consideration to including using your giving plans.

With warm regards,

Chuck Norris



To help the Kick Start Foundation
 please send your donation to:

427 W. 20th Street, Ste. 203
Houston, TX 77008

Kick Start Foundation

CHUCK NORRIS.com

**CHUCK
NORRIS****FITNESS**

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THE TOTAL GYM

**This is the Total Gym exercise machine
as endorsed by Chuck Norris.**

The Total Gym allows you to train with natural multi-plane movements, working the large muscles synergistically against gravity. Recruiting the stabilizer muscles in nearly every exercise, you stretch and flex your way through a full body workout in as little as 20 minutes a day. This is functional exercise; it mimics the way you function in life, creating a superior body and superior physical performance. For more information click on the video of Chuck and Gina Norris.



Video Small 2.5 mb

Video Medium 5 mb

Purchase the Total Gym from ChuckNorris.com

CHUCK NORRIS.com

CHUCK NORRIS

CHRISTIAN AREA

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THE TOTAL DVD



Welcome to the Christian Area

Thanksgiving from the heart



Oh, Give Thanks Unto

Oh, give thanks unto the Lord, for the
For the new breath each day, you give
Every day is a blessing, affirm
Along with the grace to carry

Oh, give thanks unto the Lord, for
For walking right beside you, in every
And on days when you feel like a
He'll love on your heart when you
Oh, give thanks unto the Lord for the
For His eyes are always upon you, the
He is an awesome Lord, who deserves
For the wonderful things He does
Oh, give thanks unto the Lord, for every
He is so very worthy of your adoration
For His thoughtful ways, He has to
He desires thanksgiving, glory, and honor

Written for Thanksgiving, 2007

Please watch the Lifehouse Everything Skit

GodTube : Broadcast Him

(Randy Alcorn's blog)

Eternal Perspectives

Purchase Randy Alcorn Books

Who Is Jesus?

**CHUCK
NORRIS****CURRENT EVENTS**

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[Upcoming Events](#) | [Current Events](#) | [Past Events](#)

Upcoming Events



Chuck Norris Endorses Mike Huckabee
New WCL Schedule for 2007-2008

Chuck Norris Fact: The Surge is Working - so is Huckabee's!

www.MikeHuckabee.com

CHUCK NORRIS STATEMENT REGARDING ENDORSEMENT OF PRESIDENTIAL CANDIDATE MIKE HUCKABEE

Like many of you, I've been giving a great deal of thought as to which candidate might best lead this country, in this critical time, as our next president. It is a question I am asked quite often by fans and the media.

I've always known that the person to whom I pledge my vote must be someone I can embrace wholeheartedly and enthusiastically. It is now clear to me that the candidate is Arkansas Governor, Mike Huckabee. Mike is a man whose sense of integrity and commitment are supported by a lifetime of accomplishments, strong family values, and clear vision of what America should be and can be. Mike Huckabee is a man of strong moral character and impeccable qualifications. He is the real deal and that is why he has my vote.

To read more on my position, log on to my World Net Daily column at --
www.worldnetdaily.com/staticarticles/article56107.html

November 26, 2007

[Huckabee bringing Chuck Norris to CNN/YouTube debate](#)



Norris and Huckabee appear in a campaign ad running in Iowa.

WASHINGTON (CNN) — Republican presidential candidate **Mike Huckabee** appears to be milking cult hero Chuck Norris' endorsement for all it's worth.

The former Arkansas governor told reporters on a conference call Monday morning that the "Walker Texas Ranger" star will be joining him at the CNN/YouTube debate this Wednesday night.

"[He] will be part of that experience," Huckabee said. "So it will be fun and hopefully very substantive."

Norris **officially endorsed Huckabee** last October, hailing him as a "respected and fearless leader" and one who's "not afraid to stand up for a Creator and against secularist beliefs."

Since then Norris has **penned a fundraising e-mail** on Huckabee's behalf, and even appears alongside the candidate in a television ad running in Iowa.

"When Chuck Norris does a push up, he isn't lifting himself up, he's pushing the world down," Huckabee, quoting the now famous "Chuck Norris Facts," says in the ad.

On Monday, Huckabee credited the ad for brining "a lot of attention" to his presidential bid.

"We had a lot of fun with it and it did exactly what we wanted it to do, and that is drive record numbers of people to our Web site," Huckabee said. "And it has made the rounds on YouTube and as people have e-mailed it to their friends, it has had a big impact on the 18-30 year-old market, which we expected it to do."

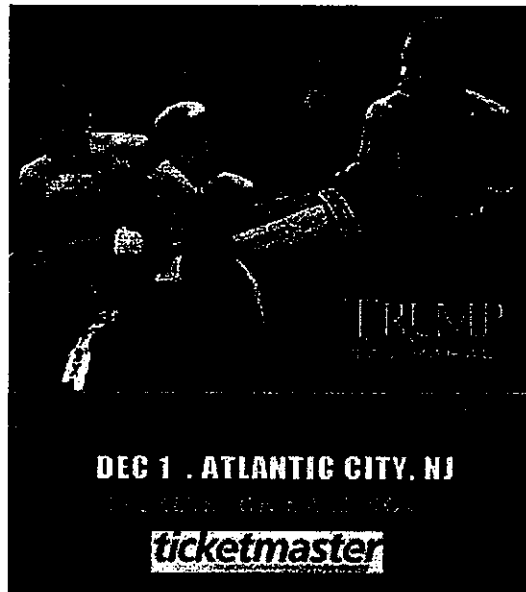
Huckabee also brushed aside criticism from some for promoting Norris' endorsement, as well **as that of professional wrestler** Ric Flair, so heavily.

"The only flak I get is from people who wish they had them," he said. "The rest of the time people are enjoying it and having fun with it as I am."

Huckabee's comments come the same day he announced the release of a new TV ad in Iowa. The 30-second spot, called "Believe," touts his conservative stances on social issues.

– CNN Ticker Producer Alexander Mooney

<http://www.worldcombatleague.com/>



Results of the Denver Event

Stars and Dragons steal the show in Denver.

The 2007 Season Opener featured dominating performances by both the Texas Dragons and the Los Angeles Srs. Raymond "The Real Deal" Daniels (Los Angeles) once again displayed his elite skills as he put on a show for the Denver Coliseum. The Texas Dragons' Lawson "Meet Your Maker" Baker shocked the crowd with his powerful performance leading the Dragons to a victory over the hometown Fury.



Chuck Norris Visits "The Sports Guys!"

http://www.fan950.com/videos/chuck_norris_lan.wmv

Watch all the events on the Versus channel

2007-2008 Season Schedule

Dec 01, 07 - New Jersey Tigers vs. New York Clash |
St. Louis Enforcers vs. Miami Force
- Taj Mahal | Atlantic City, New Jersey

Dec 14, 07 - Oklahoma Destroyers vs. Texas Dragons |
Denver Fury vs. Los Angeles Stars
- Tulsa, Oklahoma

TBD - Miami Force vs. New York Clash | St. Louis
Enforcers vs. New Jersey Tigers
- TBD

TBD - Denver Fury vs. Texas Dragons | Oklahoma
Destroyers vs. Los Angeles Stars
- TBD

TBD - New York Clash vs. St. Louis Enforcers | Miami
Force vs. New Jersey Tigers
- TBD

TBD - Oklahoma Destroyers vs. Denver Fury | Texas
Dragons vs. Los Angeles Stars

- TBD

TBD - Miami Force vs. St. Louis Enforcers | New York
Clash vs. New Jersey Tigers
- TBD

2007 Season PLAYOFFS / Championship

Mar 29, 08 - WCL Playoffs

Western Conf. Semi Finalist vs. Western
Conf. Semi Finalist

Eastern Conf. Semi Finalist vs. Eastern
Conf. Semi Finalist

May 3, 08 - WCL 2007 Championship

Up Eastern Runner Up vs. Western Runner
Up

Eastern Finalist vs. Western Finalist

**Chuck Norris has a column in the
WorldNetDaily
Started Monday October 23, 2006**

WorldNetDaily®

Read Chuck's column in the WorldNetDaily

Read the WorldNetDaily



Watch the World Combat League on the Versus Channel



World Combat League



The World Combat League (WCL) is the creation of action-film and television star Chuck Norris. Norris has organized the world's most experienced martial arts producers to make the vision become reality. Chuck Norris, as the creative head, has joined together a number of innovators to present the next major American sporting league, and the next generation of martial arts combat entertainment.

World Combat League athletes are well-conditioned, exciting fighters with dynamic kicking skills. To encourage a "full throttle" style of fighting, each fighter will only fight a total of two rounds. This is intended to encourage each fighter to answer the bell with the spirit, desire and determination to earn their team as many points as possible by fighting aggressively every second of each round. The judge's scoring system and the referee's penalty point system is designed to reward this "full throttle" style of fighting and penalize any attempt to stall or be passive.

CHUCK NORRIS.com

[MISSION](#)[BIOGRAPHY](#)[KICKSTART](#)[FILMOGRAPHY](#)[SHOPPING](#)[CHAT ROOM](#)[AUCTION](#)[KIDS CORNER](#)[CURRENT EVENTS](#)[FAREWELL LETTER](#)[CHRISTIAN AREA](#)[FITNESS](#)[LINKS](#)[EMAIL](#)

FREE POSTER
WITH PURCHASE OF
THE TOTAL GYM

Chuck's "Farewell to Walker" Letter

Dear Friends:

I was lying in bed a couple of months ago and I started reflecting back to my Martial Arts career as a fighter. I remembered back to 1974, when I decided to retire after six years as the undefeated World Middleweight Karate Champion. I thought that I could defend my title again in 1975 at the age of 35 and win my seventh consecutive year, but then again I could probably lose, so I decided to retire as an undefeated champion. To this day I am considered one of the top fighters of all time. If I had fought and lost, that may not have been the case.

Then I began thinking about *Walker, Texas Ranger*. Fortunately, *Walker* has been a top rated series for eight years and I thought it could probably have a successful ninth season, but then again maybe not. Anyway that is the reason I am ending *Walker, Texas Ranger*. I want the series to end as a winner. I know the let down of *Walker* being over will be very emotionally hard on me, just as it did when I retired as a fighter, but I did not stop doing my Martial Arts when I retired and I will not stop acting when *Walker* is over. I hope whenever my acting career goes that I will still have your support! As I have always believed, "When one door closes, a bigger one opens."

God Bless you.

Sincerely your friend,

Chuck Norris

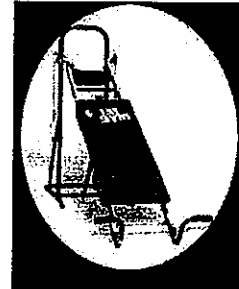
CHUCK NORRIS.com

**CHUCK
NORRIS****FITNESS**[MISSION](#)[BIOGRAPHY](#)[BACKSTORY](#)[FILMOGRAPHY](#)[SHOPPING](#)[CHAT ROOM](#)[AUCTION](#)[KIDS CORNER](#)[CURRENT EVENTS](#)[FAREWELL LETTER](#)[CHRISTIAN AREA](#)[FITNESS](#)[LINKS](#)[EMAIL](#)

FREE POSTER
WITH PURCHASE OF
THE TOTAL GYM

**This is the Total Gym exercise machine
as endorsed by Chuck Norris.**

The Total Gym allows you to train with natural multi-plane movements, working the large muscles synergistically against gravity. Recruiting the stabilizer muscles in nearly every exercise, you stretch and flex your way through a full body workout in as little as 20 minutes a day. This is functional exercise; it mimics the way you function in life, creating a superior body and superior physical performance. For more information click on the video of Chuck and Gina Norris.



Video Small 2.5 mb

Video Medium 5 mb

Purchase the Total Gym from ChuckNorris.com

CHUCK NORRIS.com

Kick Start Foundation

CHUCK NORRIS.com

**CHUCK
NORRIS****LINKS**

MISSION
BIOGRAPHY
KICKSTART
FILMOGRAPHY
SHOPPING
CHAT ROOM
AUCTION
KIDS CORNER
CURRENT EVENTS
FAREWELL LETTER
CHRISTIAN AREA
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KickStart

<http://www.kick-start.org>

World Combat League

<http://www.worldcombatleague.com/>

United Fighting Arts Federation

<http://www.ufaf.org>

UFAF Visitors Information Page

http://www.ufaf.org/visitors_page.htm

WorldBlackBelt.com

<http://www.worldblackbelt.com>

Norris Racing

<http://www.norrisracing.com>

Walker Store

<http://www.walkerstore.com/>

New Man Magazine

<http://www.newmanmag.com>

Tirk Wilder "The Eyes of the Ranger" Buy the CD!

<http://www.tirkwilder.com/>

World Net Daily News

<http://worldnetdaily.com/>

CHUCK NORRIS

SHOPPING

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WARNING!

**DUE TO FRAUDULENT CREDIT CARD USE, ALL CARDS WILL BE
VERIFIED BEFORE ITEMS ARE SHIPPED**

Chucknorris.com Exclusive Item:

Total Gym Signature Edition

*Signature Edition Currently Available Only In 14000 Model
(learn more here)*

New Item: The Troop Shirt

Olive Tank Top / Black Tank Top / Black T-Shirt

New Item: Official Chuck Norris 22oz Sports Bottle

New Item: The Words to Live By Mug

New Item: Chuck's "The Fact" Poster

New Item: Chuck's "The Fact" Shirt

New Item: Chuck's "The Fact" Beanie

Chuck's New Book
"Against All Odds, My Story"

Chuck's New Book
"The Justice Riders"

**We have decided to lock in reduced prices for the
following items, a courtesy to our fans.**

Walker Poster \$7.95

Code of Ethics \$10.95

Photos \$7.95

Shirts \$10.95

Chuck Norris Hat \$15.00

****Note: You have the option to have select items
(posters, photos, book) autographed by Mr. Norris
for an additional charge of \$100.00. This additional
amount will go to benefit the Kick Start program, a
private charity founded by Mr. Norris***

***All items on these pages are exclusive
and can not be found in any store.**

Click on the links above to begin shopping.

To order by credit card click on the "ADD TO CART" link. Be sure to
include the quantity. You can order via money

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CHRISTIAN AREA
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order as well, please make payable to:

Chucknorris.com
P.O. Box 369
Chester, California 96020

Please include your name, address, item description, shipping and handling to the total cost when you order.

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CHUCK NORRIS.com

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- LINKS
- EMAIL
- FREE POSTER
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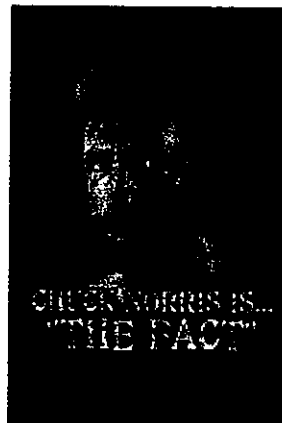
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Chuck Norris is... "THE FACT" - Poster
\$8.95 + \$6.00 Shipping

Chuck Norris is... "THE FACT" Poster
(Background has 10 of Mr. Norris' favorite quotes repeated)

Quantity:

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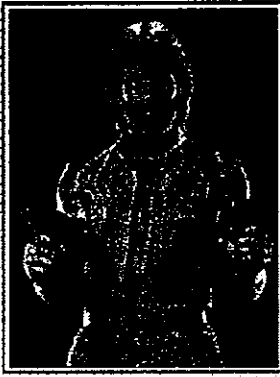
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CHUCK NORRIS.com

EXHIBIT C

EXHIBIT C

Sample Website Pages from Chucknorrisfacts.com



CHUCK NORRIS FACTS



Home - Facts - New Facts - Shirt Designer - Premade Shirts - ChuckNorris.com

★ Design A Shirt!



★ Premade Shirts



★ Our Friends



1. Guns don't kill people. Chuck Norris kills People.
2. There is no theory of evolution. Just a list of animals Chuck Norris allows to live.
3. Chuck Norris does not sleep. He waits.
4. The chief export of Chuck Norris is Pain.
5. There is no chin under Chuck Norris' Beard. There is only another fist.
6. Chuck Norris has two speeds. Walk, and Kill.
7. The leading causes of death in the United States are: 1. Heart Disease 2. Chuck Norris 3. Cancer
8. Chuck Norris drives an ice cream truck covered in human skulls.
9. Chuck Norris is my Homeboy.
10. Chuck Norris doesn't go hunting.... CHUCK NORRIS GOES KILLING

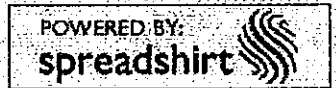
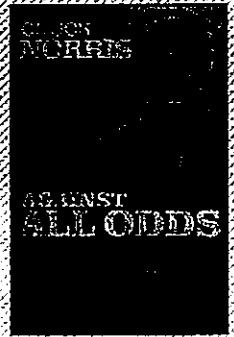
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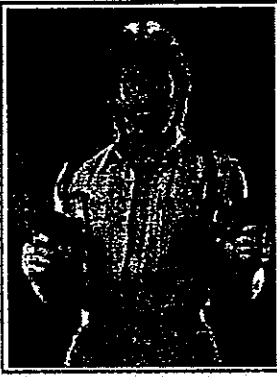
★ **Click here for more Chuck Norris Facts!**

★ **Chuck's Favorites: Picked by the man himself!**

- When the Boogeyman goes to sleep every night, he checks his closet for Chuck Norris.
- Chuck Norris doesn't read books. He stares them down until he gets the information he wants.
- There is no theory of evolution. Just a list of creatures Chuck Norris has allowed to live.
- Outer space exists because it's afraid to be on the same planet with Chuck Norris.
- Chuck Norris does not sleep. He waits.
- Chuck Norris is currently suing NBC, claiming Law and Order are trademarked names for his left and right legs.
- Chuck Norris is the reason why Waldo is hiding.
- Chuck Norris counted to infinity - twice.
- There is no chin behind Chuck Norris' beard. There is only another fist.
- When Chuck Norris does a pushup, he isn't lifting himself up, he's pushing the Earth down.
- Chuck Norris is so fast, he can run around the world and punch himself in the back of the head.
- Chuck Norris' hand is the only hand that can beat a Royal Flush.
- Chuck Norris can lead a horse to water AND make it drink.
- Chuck Norris doesn't wear a watch, HE decides what time it is.
- Chuck Norris gave Mona Lisa that smile.

- Chuck Norris can slam a revolving door.
- Chuck Norris does not get frostbite. Chuck Norris bites frost.
- Remember the Soviet Union? They decided to quit after watching a Delta Force marathon on Satellite TV.
- Contrary to popular belief, America is not a democracy, it is a Chucktatorship.





CHUCK NORRIS FACTS



Home - Facts - New Facts - Shirt Designer - Premade Shirts - ChuckNorris.com

★ More Chuck Norris Facts! (Page 1)

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★ Design A Shirt!

- In Pamplona, Spain, the people may be running from the bulls, but the bulls are running from Chuck Norris. (New!)
- Chuck Norris uses pepper spray to spice up his steaks. (New!)
- Chuck Norris once roundhouse kicked someone so hard that his foot broke the speed of light, went back in time, and killed Amelia Earhart while she was flying over the Pacific Ocean.
- Crop circles are Chuck Norris' way of telling the world that sometimes corn needs to lie down.
- Chuck Norris is ten feet tall, weighs two-tons, breathes fire, and could eat a hammer and take a shotgun blast standing.
- The Great Wall of China was originally created to keep Chuck Norris out. It failed miserably.
- Contrary to popular belief, Chuck Norris, not the box jellyfish of northern Australia, is the most venomous creature on earth. Within 3 minutes of being bitten, a human being experiences the following symptoms: fever, blurred vision, beard rash, tightness of the jeans, and the feeling of being repeatedly kicked through a car windshield.
- Most people have 23 pairs of chromosomes. Chuck Norris has 72... and they're all poisonous.
- If you ask Chuck Norris what time it is, he always says, "Two seconds 'til." After you ask, "Two seconds 'til what?" he roundhouse kicks you in the face.
- Chuck Norris drives an ice cream truck covered in human skulls.
- When Chuck Norris sends in his taxes, he sends blank forms and includes only a picture of himself, crouched and ready to attack. Chuck Norris has not had to pay taxes, ever.
- The quickest way to a man's heart is with Chuck Norris' fist.
- Chuck Norris invented Kentucky Fried Chicken's famous secret recipe, with eleven herbs and spices. But nobody ever mentions the twelfth ingredient: Fear.
- CNN was originally created as the "Chuck Norris Network" to update Americans with on-the-spot ass-kicking in real-time.
- Chuck Norris can win a game of Connect Four in only three moves.
- There is no theory of evolution, just a list of creatures Chuck Norris allows to live.
- Chuck Norris once ate three 72 oz. steaks in one hour. He spent the first 45 minutes having sex with his waitress.
- What was going through the minds of all of Chuck Norris' victims before they died? His shoe.
- Chuck Norris is the only man to ever defeat a brick wall in a game of tennis.
- Police label anyone attacking Chuck Norris as a Code 45-11.... a suicide.
- Chuck Norris doesn't churn butter. He roundhouse kicks the cows and the butter comes straight out.
- Chuck Norris doesn't wash his clothes, he disembowels them.
- A Handicapped parking sign does not signify that this spot is for handicapped people. It is actually in fact a warning, that the spot belongs to Chuck Norris and that you will be handicapped if you park there.
- Chuck Norris will attain statehood in 2009. His state flower will be the Magnolia.
- Someone once videotaped Chuck Norris getting pissed off. It was called Walker: Texas Chain Saw Masacre.
- If you spell Chuck Norris in Scrabble, you win. Forever.
- Chuck Norris originally appeared in the "Street Fighter II" video game, but was removed by Beta Testers because every button caused him to do a roundhouse kick. When asked bout this "glitch," Norris replied, "That's no glitch."
- Fool me once, shame on you. Fool Chuck Norris once and he will roundhouse you in the face.
- The opening scene of the movie "Saving Private Ryan" is loosely based on games of dodgeball Chuck Norris played in second grade.
- Chuck Norris once shot down a German fighter plane with his finger, by yelling, "Bang!"
- Chuck Norris once bet NASA he could survive re-entry without a spacesuit. On July 19th, 1999, a naked Chuck Norris re-entered the earth's atmosphere, streaking over 14 states and reaching a temperature of 3000 degrees. An embarrassed NASA publically claimed it was a meteor, and still owes him a beer.
- Chuck Norris has two speeds: Walk and Kill.



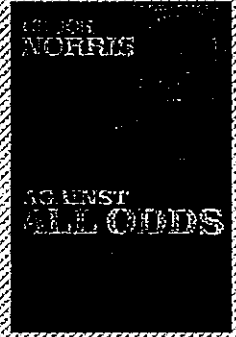
★ Premade Shirts



★ Our Friends



- Someone once tried to tell Chuck Norris that roundhouse kicks aren't the best way to kick someone. This has been recorded by historians as the worst mistake anyone has ever made.
- Contrary to popular belief, America is not a democracy, it is a Chucktatorship.
- Teenage Mutant Ninja Turtles is based on a true story: Chuck Norris once swallowed a turtle whole, and when he crapped it out, the turtle was six feet tall and had learned karate.
- Chuck Norris is not hung like a horse... horses are hung like Chuck Norris.
- Faster than a speeding bullet... more powerful than a locomotive... able to leap tall buildings in a single bound... yes, these are some of Chuck Norris's warm-up exercises.
- Chuck Norris is the only human being to display the Heisenberg uncertainty principle -- you can never know both exactly where and how quickly he will roundhouse-kick you in the face.
- In the Bible, Jesus turned water into wine. But then Chuck Norris turned that wine into beer.
- Chuck Norris can hit you so hard that he can actually alter your DNA. Decades from now your descendants will occasionally clutch their heads and yell "What The Hell was That?"
- Time waits for no man. Unless that man is Chuck Norris.
- Chuck Norris discovered a new theory of relativity involving multiple universes in which Chuck Norris is even more badass than in this one. When it was discovered by Albert Einstein and made public, Chuck Norris roundhouse-kicked him in the face. We know Albert Einstein today as Stephen Hawking.
- Chuck Norris doesn't shower, he only takes blood baths.
- The Chuck Norris military unit was not used in the game Civilization 4, because a single Chuck Norris could defeat the entire combined nations of the world in one turn.
- In an average living room there are 1,242 objects Chuck Norris could use to kill you, including the room itself.
- According to the Encyclopedia Britannica, the Native American "Trail of Tears" has been redefined as anywhere that Chuck Norris walks.
- Chuck Norris does not teabag the ladies. He potato-sacks them.
- Pluto is actually an orbiting group of British soldiers from the American Revolution who entered space after the Chuck gave them a roundhouse kick to the face.
- When Chuck Norris goes to donate blood, he declines the syringe, and instead requests a hand gun and a bucket.
- There are no steroids in baseball. Just players Chuck Norris has breathed on.
- Chuck Norris once challenged Lance Armstrong in a "Who has more testicles?" contest. Chuck Norris won by 5.
- Chuck Norris was the fourth wise man, who gave baby Jesus the gift of beard, which he carried with him until he died. The other three wise men were enraged by the preference that Jesus showed to Chuck's gift, and arranged to have him written out of the bible. All three died soon after of mysterious roundhouse-kick related injuries.
- Chuck Norris sheds his skin twice a year.



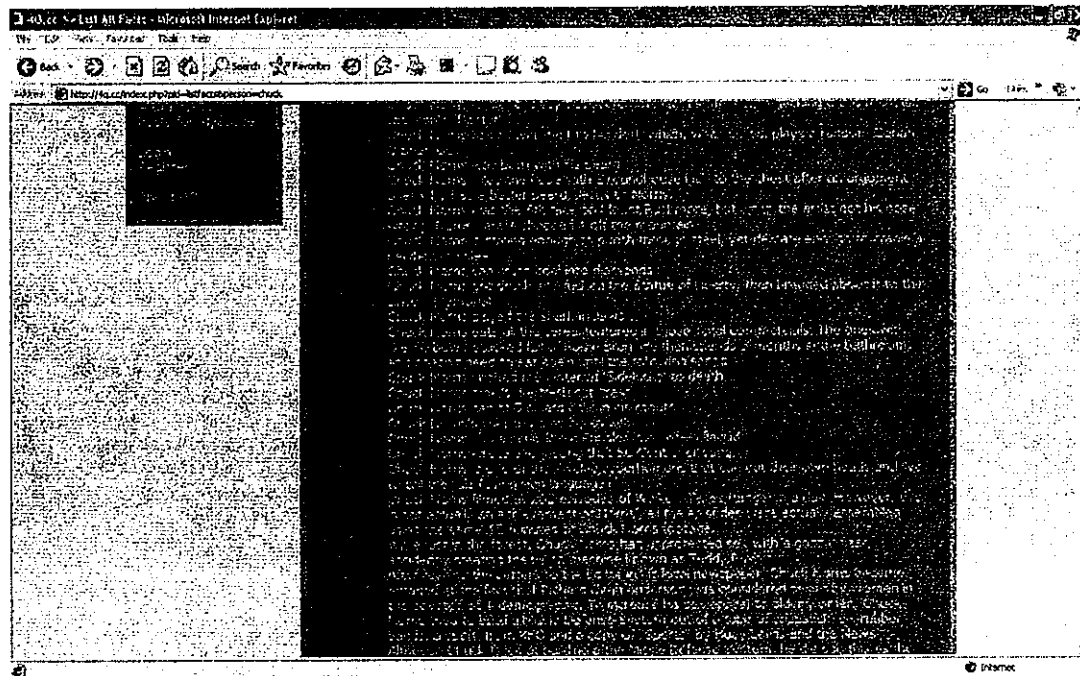
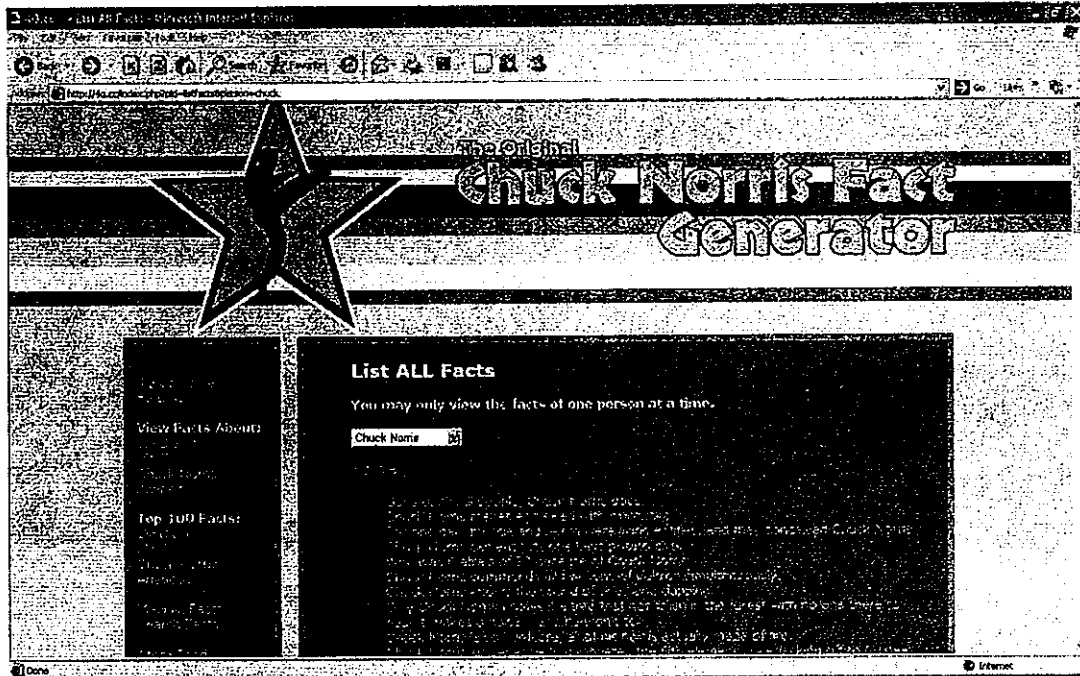
★ **Click here for more Chuck Norris Facts!**

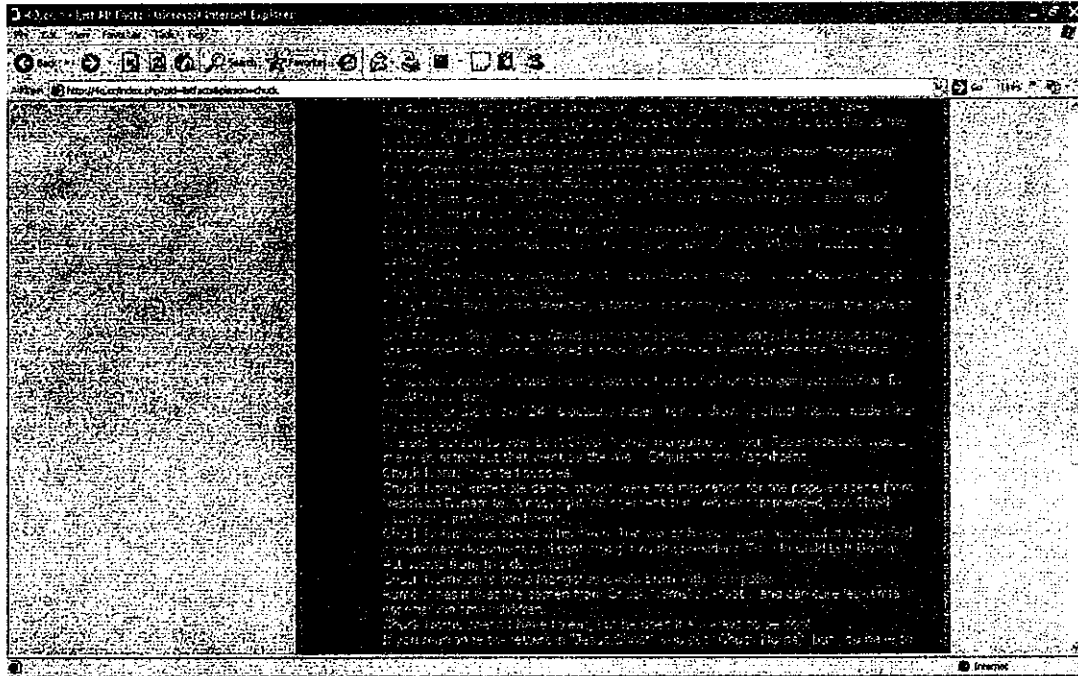
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EXHIBIT D

EXHIBIT D

Sample Website Pages from 4q.cc





The screenshot shows an Internet Explorer window with the address bar displaying "http://www.ck12.org/ck12-101/ck12-person-check". The page content is mostly obscured by a large black rectangle. Visible text includes a paragraph starting with "In 1998, the first of several...".

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About Us

4Q.cc is the home of the Chuck Norris, Vin Diesel, and Mr. T Random Fact Generators. We know there're a lot of sites like ours online today, but we're the one that started it all. Since April of 2005, we've received over 140 million visitors from around the world as well as international press coverage. [Read on.](#)

Site News

Mr. Huckabee

Posted by Ian on November 20th, 8:43 AM

Some of you may have already seen this new [commercial](#) running in Iowa for political candidate Mike Huckabee. For those of you who haven't seen it, Mike Huckabee throws out some Chuck Norris Facts

(from our website) and Chuck Norris mentions some facts about Huckabee. There are well over a hundred news articles available to read that discuss the "best ad of the campaign so far" and its context in Huckabee's political strategy.

Now, I'm not really all that much of a political person, but here's what I think, because apparently people want to know. As a somewhat high-profile supporter of Huckabee, it is a completely logical step for Chuck and Huckabee to get together and bang this ad out. Huckabee is just using another resource available to him as far as I can tell, and there's nothing wrong with that. Obviously, I never had any intentions of these Chuck Norris Facts getting so popular in the first place, so the fact that they've now entered into mainstream politics is rather surprising and enjoyable, but not really in the traditional sense. You know how if you've ever played a prank, and somehow it keeps "going further and further"? Sort of like that.

That being said, I'm glad to see our politicians embracing the internet and everything it has spawned in their efforts to win the White House. I wish Mr. Huckabee the best of luck-- after all, those facts he recited *did* make this site world famous. Honestly, I think the ad feels just a tad more "Superbowl" than "Election '08," but hey, it raises the bar as to what other internet memes candidates will get behind so as to promote themselves. Personally, I'd really like to see Barack Obama featured in Soulja Boy's next single, Rudy Giuliani doing the "Evolution of Dance", or Hilary Clinton covering "Dick in a Box".

That'll get the kids to go out and vote.

1 comment

A new look for a new book

Posted by **Ian** on **October 28th, 11:56 AM**

For long-time visitors to the site, you probably have noticed the recent face lift we've given things. It was long overdue, but here's why:

I am pleased to announce the publication of my new book, "The Truth About Chuck Norris: 400 Facts About The World's Greatest Human," the illustrated lowdown on the toughest, sexiest, and bearded man to ever stalk the earth. The book contains 400 of the site's best facts as well as 20 very awesome illustrations that haven't ever appeared online before. A must-have paean to the archetypal American male and a bible of all things Chuck, this is easily the most important book written of all time.

The book is going to be published by Gotham, a division of Penguin, and it hits the shelves **November 29th, 2007** for \$12. **Click here to pre-order your copies** today!

3 comments

Older News

Fast Facts

Chuck Norris doesn't speak English. He speaks "Chuckish" which coincidentally is exactly the same as English.

Mr. T does not buy chains from jewelry stores, jewelry stores by from Mr. T.

When Vin Diesel takes a scantron test, the letters of all his answers, when played as music, will always correspond to a piece of music written by Shostakovich.

Every time Chuck Norris ejaculates, an angel gets it beard.

When Chuck Norris had his first erection he accidentally put a hole in the ozone layer.

Who will be a President? Who Will be the Next US President? Take our Poll! YourVote2008.org	Mike Huckabee in 2008 Faith. Family. Freedom. Conservatives are choosing Huckabee www.mikehuckabee.com	Clogged Artery Learn More About a Product Designed to Open the Arteries. CypherUSA.com	Bare Facts by Blessing A wonderful book celebra irreverent look at life's ct www.TheBareFactsByBle:
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Partners In Crime:



Want to appear here?

Who will be a President? Who Will be the Next US President? Take our Poll! YourVote2008.org	Bare Facts by Blessing A wonderful book celebrating an irreverent look at life's changes. www.TheBareFactsByBlessing.com	Asthma Facts Find Info about Asthma and Review a Treatment Option. AsthmaTreatmentOption.com	Children's Tylenol Info Get The Facts About Tyle Help Stop Unintentional (Medication Tylenol.com
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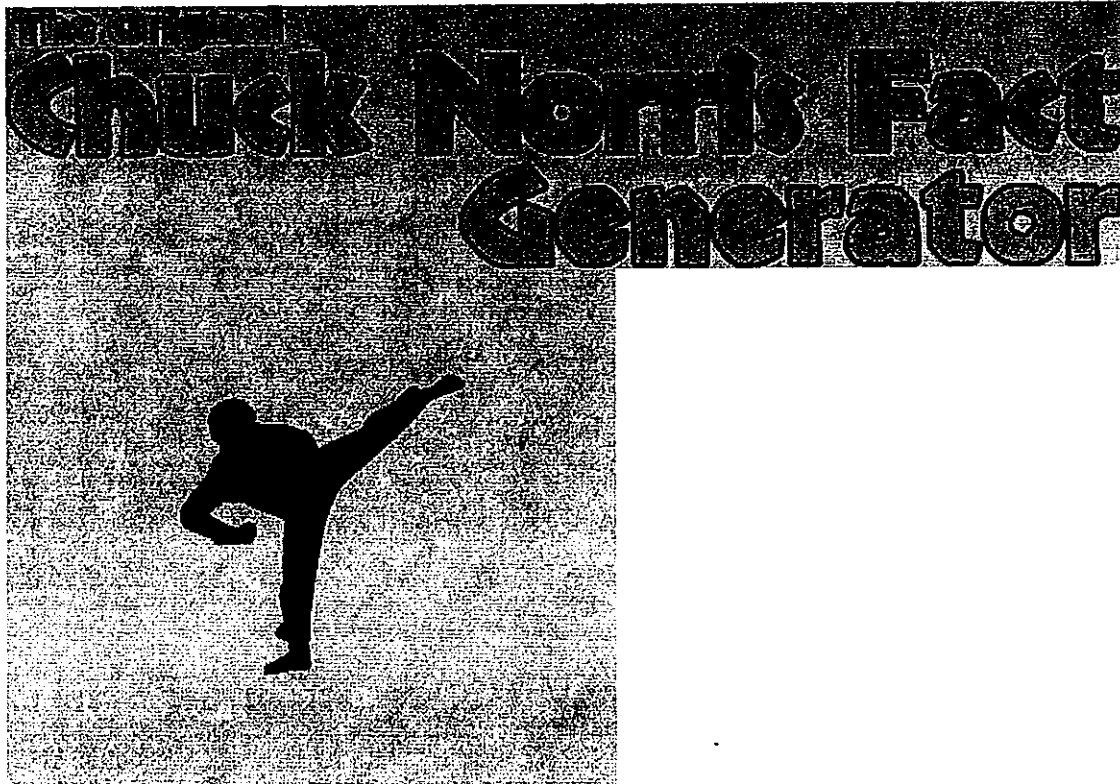
the right to add, edit, or remove your contribution to our database at any time.

Site visitors in last five minutes: 96

Users active in last five minutes: 4

Server Load: 0.24 (2 CPUs) :D

Time: 0.104453086853



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Fact	Votes	Rating
<u>Some kids piss their name in the snow. Chuck Norris can piss his name into concrete.</u>	2758	8.356
<u>Chuck Norris' calendar goes straight from March 31st to April 2nd; no one fools Chuck Norris.</u>	4891	8.351
<u>Leading hand sanitizers claim they can kill 99.9 percent of germs. Chuck Norris can kill 100 percent of whatever the fuck he wants.</u>	2352	8.350
<u>Chuck Norris once visited the Virgin Islands. They are now The Islands.</u>	1895	8.338
<u>Chuck Norris counted to infinity - twice.</u>	1679	8.333
<u>Chuck Norris' tears cure cancer. Too bad he has never cried.</u>	2164	8.332
<u>Chuck Norris does not sleep. He waits.</u>	1269	8.313
<u>Once, while having sex in a tractor-trailer, part of Chuck Norris' sperm escaped and got into the engine. We now know this truck as Optimus Prime.</u>	1963	8.299
<u>Chuck Norris can speak braille.</u>	1650	8.295
<u>On a high school math test, Chuck Norris put down "Violence" as every one of the answers. He got an A+ on the test because Chuck Norris solves all his problems with Violence.</u>	439	8.230
<u>Chuck Norris owns the greatest Poker Face of all-time. It helped him win the 1983 World Series of Poker despite him holding just a Joker, a Get out of Jail Free Monopoly card, a 2 of clubs, 7 of spades and a green #4 card from the game Uno.</u>	1423	8.195
<u>If you spell Chuck Norris wrong on Google it doesn't say, "Did you mean Chuck Norris?" It simply replies, "Run while you still have the chance."</u>	787	8.183
<u>Chuck Norris puts the "laughter" in "manslaughter".</u>	1433	8.156
<u>Chuck Norris can do a wheelie on a unicycle.</u>	644	8.130
<u>Chuck Norris once won a game of Connect Four in 3 moves.</u>	312	8.038
<u>Chuck Norris was originally cast as the main character in 24, but was replaced by the producers when he managed to kill every terrorist and save the day in 12 minutes and 37 seconds.</u>	2609	7.985
<u>Once a cobra bit Chuck Norris' leg. After five days of excruciating pain, the cobra died.</u>	960	7.971
<u>Chuck Norris can delete the Recycling Bin.</u>	632	7.948
<u>Chuck Norris died ten years ago, but the Grim Reaper can't get up the courage to tell him.</u>	1011	7.946
<u>When the Boogeyman goes to sleep every night he checks his closet for Chuck Norris.</u>	922	7.946
<u>Chuck Norris does not hunt because the word hunting implies the possibility of failure. Chuck Norris goes killing.</u>	1000	7.915
<u>Chuck Norris can slam revolving doors.</u>	1056	7.869
<u>Superman owns a pair of Chuck Norris pajamas.</u>	1030	7.859
<u>If it looks like chicken, tastes like chicken, and feels like chicken but Chuck Norris says its beef, then it's fucking beef.</u>	979	7.818
<u>Giraffes were created when Chuck Norris uppercutted a horse.</u>	949	7.783
<u>Chuck Norris doesn't read books. He stares them down until he gets the information he wants.</u>	797	7.709
<u>Chuck Norris sleeps with a night light. Not because Chuck Norris is afraid of the dark, but the dark is afraid of Chuck Norris</u>	777	7.671

<u>Chuck Norris secretly sleeps with every woman in the world once a month. They bleed for a week as a result.</u>	1005	7.658
<u>When Chuck Norris gives you the finger, he's telling you how many seconds you have left to live.</u>	684	7.635
<u>Chuck Norris sold his soul to the devil for his rugged good looks and unparalleled martial arts ability. Shortly after the transaction was finalized, Chuck roundhouse kicked the devil in the face and took his soul back. The devil, who appreciates irony, couldn't stay mad and admitted he should have seen it coming. They now play poker every second Wednesday of the month.</u>	1011	7.605
<u>If you play Led Zeppelin's "Stairway to Heaven" backwards, you will hear Chuck Norris banging your sister.</u>	711	7.586
<u>Chuck Norris' dog is trained to pick up his own poop because Chuck Norris will not take shit from anyone.</u>	800	7.573
<u>Chuck Norris doesn't have hair on his testicles, because hair does not grow on steel.</u>	833	7.568
<u>Chuck Norris can kill two stones with one bird.</u>	810	7.563
<u>Chuck Norris was once on Celebrity Wheel of Fortune and was the first to spin. The next 29 minutes of the show consisted of everyone standing around awkwardly, waiting for the wheel to stop.</u>	815	7.531
<u>Chuck Norris is always on top during sex because Chuck Norris never fucks up.</u>	794	7.494
<u>Chuck Norris doesn't pop his collar, his shirts just get erections when they touch his body.</u>	897	7.492
<u>The best part of waking up is not Folgers in your cup, but knowing that Chuck Norris didn't kill you in your sleep.</u>	580	7.484
<u>When Chuck Norris goes cow-tipping, he lifts a cow up and drop kicks it into the neighboring farm. All the other cows simply tip themselves over to keep from having to walk back in the dark.</u>	48	7.479
<u>Chuck Norris is the only person on the planet that can kick you in the back of the face.</u>	823	7.463
<u>Bill Gates lives in constant fear that Chuck Norris' PC will crash.</u>	886	7.448
<u>Ghosts are actually caused by Chuck Norris killing people faster than Death can process them.</u>	779	7.439
<u>Death once had a near-Chuck-Norris experience.</u>	704	7.411
<u>Chuck Norris never retreats, he just attacks in the opposite direction.</u>	350	7.386
<u>Chuck Norris was once charged with three attempted murdered in Boulder County, but the Judge quickly dropped the charges because Chuck Norris does not "attempt" murder.</u>	409	7.379
<u>Chuck Norris can build a snowman out of rain.</u>	755	7.367
<u>Chuck Norris plays russian roulette with a fully loded revolver... and wins.</u>	664	7.366
<u>Chuck Norris has to maintain a concealed weapon license in all 50 states in order to legally wear pants.</u>	726	7.353
<u>The reason newborn babies cry is because they know they have just entered a world with Chuck Norris.</u>	668	7.326
<u>Chuck Norris can strangle you with a cordless phone.</u>	545	7.319
<u>Chuck Norris is not hung like a horse... horses are hung like Chuck Norris</u>	716	7.318
<u>Mr. T once defeated Chuck Norris in a game of Tic-Tac-Toe. In retaliation, Chuck Norris invented racism.</u>	1035	7.310
<u>Chuck Norris likes to knit sweaters in his free time. And by "knit", I mean "kick", and by</u>		

<u>"sweaters", I mean "babies".</u>	971	7.301
<u>Chuck Norris can drown a fish.</u>	614	7.290
<u>Chuck Norris can play the violin with a piano</u>	43	7.279
<u>M.C. Hammer learned the hard way that Chuck Norris can touch this.</u>	669	7.263
<u>Chuck Norris is 1/8th Cherokee. This has nothing to do with ancestry, the man ate a fucking Jeep.</u>	918	7.258
<u>When Chuck Norris enters a room, he doesn't turn the lights on, he turns the dark off.</u>	642	7.254
<u>Chuck Norris once punched a man in the soul.</u>	800	7.238
<u>It is considered a great accomplishment to go down Niagara Falls in a wooden barrel.</u>	608	7.237
<u>Chuck Norris can go up Niagara Falls in a cardboard box.</u>		
<u>Chuck Norris once had a heart attack; his heart lost.</u>	658	7.204
<u>When Chuck Norris looks in a mirror the mirror shatters, because not even glass is stupid enough to get in between Chuck Norris and Chuck Norris.</u>	688	7.193
<u>Chuck Norris once bowled a 300. Without a ball. He wasn't even in a bowling alley.</u>	191	7.168
<u>Rosa Parks refused to get out of her seat because she was saving it for Chuck Norris.</u>	792	7.165
<u>Chuck Norris doesn't need a miracle in order to split the ocean. He just walks in and the water gets the fuck out of the way.</u>	458	7.159
<u>Jack was nimble, Jack was quick, but Jack still couldn't dodge Chuck Norris' roundhouse kick.</u>	759	7.155
<u>A rogue squirrel once challenged Chuck Norris to a nut hunt around the park. Before beginning, Chuck simply dropped his pants, instantly killing the squirrel and 3 small children. Chuck knows you can't find bigger, better nuts than that.</u>	499	7.146
<u>A Handicap parking sign does not signify that this spot is for handicapped people. It is actually in fact a warning, that the spot belongs to Chuck Norris and that you will be handicapped if you park there.</u>	650	7.143
<u>Chuck Norris can make a paraplegic run for his life.</u>	189	7.138
<u>The only time Chuck Norris was wrong was when he thought he had made a mistake.</u>	689	7.134
<u>The chief export of Chuck Norris is pain.</u>	751	7.123
<u>Brett Favre can throw a football over 50 yards. Chuck Norris can throw Brett Favre even further.</u>	421	7.121
<u>Chuck Norris doesn't use pickup lines, he simply says, "Now."</u>	817	7.120
<u>Chuck Norris can create a rock so heavy that even he can't lift it. And then he lifts it anyways, just to show you who the fuck Chuck Norris is.</u>	759	7.104
<u>When God said, "Let there be light", Chuck Norris said, "say please."</u>	824	7.103
<u>The last digit of pi is Chuck Norris. He is the end of all things.</u>	676	7.099
<u>Chuck Norris can tie his shoes with his feet.</u>	584	7.079
<u>Chuck Norris was originally offered the role as Frodo in Lord of the Rings. He declined because, "Only a pussy would need three movies to destroy a piece of jewelery."</u>	702	7.067
<u>Chuck Norris is currently in a legal battle with the makers of Bubble Tape. Norris claims "6 Feet of Fun" is actually the trademark for his penis.</u>	693	7.062
<u>The quickest way to a man's heart is with Chuck Norris's fist.</u>	641	7.056
<u>Pinatas were made in an attempt to get Chuck Norris to stop kicking the people of Mexico. Sadly this backfired, as all it has resulted in is Chuck Norris now looking for candy after he kicks his victims.</u>	681	7.051

<u>If you can see Chuck Norris, he can see you. If you can't see Chuck Norris you may be only seconds away from death.</u>	645	7.045
<u>The phrase, "You are what you eat" cannot be true based on the amount of pussy Chuck Norris eats.</u>	767	7.038
<u>Chuck Norris once had an erection while lying face down and struck oil.</u>	699	7.036
<u>Chuck Norris doesn't play "hide-and-seek." He plays "hide-and-pray-I-don't-find-you."</u>	640	7.034
<u>Chuck Norris does not know where you live, but he knows where you will die.</u>	715	7.022
<u>Upon hearing that his good friend, Lance Armstrong, lost his testicles to cancer, Chuck Norris donated one of his to Lance. With just one of Chuck's nuts, Lance was able to win the Tour De France seven times. By the way, Chuck still has two testicles; either he was able to produce a new one simply by flexing, or he had three to begin with. No one knows for sure.</u>	708	7.010
<u>Most men are okay with their wives fantasizing about Chuck Norris during sex, because they are doing the same thing.</u>	689	6.996
<u>Chuck Norris is currently suing NBC, claiming Law and Order are trademarked names for his left and right legs.</u>	704	6.994
<u>Before Chuck Norris was born, the martial arts weapons with two pieces of wood connected by a chain were called NunBarrys. No one ever did find out what happened to Barry.</u>	728	6.992
<u>The saddest moment for a child is not when he learns Santa Claus isn't real, it's when he learns Chuck Norris is.</u>	626	6.987
<u>Chuck Norris is the only person that can punch a cyclops between the eye.</u>	390	6.985
<u>Chuck Norris used to beat the shit out of his shadow because it was following to close. It now stands a safe 30 feet behind him.</u>	639	6.972
<u>Chuck Norris cannot predict the future; the future just better fucking do what Chuck Norris says.</u>	627	6.963
<u>Someone once tried to tell Chuck Norris that roundhouse kicks aren't the best way to kick someone. This has been recorded by historians as the worst mistake anyone has ever made.</u>	687	6.951
<u>Bullets dodge Chuck Norris.</u>	730	6.941
<u>We all know the magic word is please. As in the sentence, "Please don't kill me." Too bad Chuck Norris doesn't believe in magic.</u>	742	6.938
<u>The only reason Chuck Norris didn't win an Oscar for his performance in "Sidekicks" is because nobody in their right mind would willingly give Chuck Norris a blunt metal object. That's just suicide.</u>	650	6.915
<u>The grass is always greener on the other side, unless Chuck Norris has been there. In that case the grass is most likely soaked in blood and tears.</u>	619	6.908
<u>The most honorable way of dying is taking a bullet for Chuck Norris. This amuses Chuck Norris because he is bulletproof.</u>	694	6.906

Fact

Votes Rating

Only facts with 25 or more votes are counted.

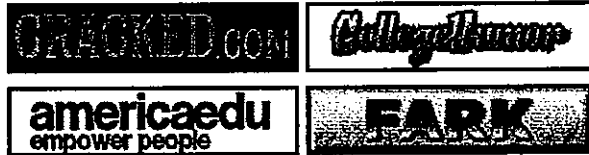
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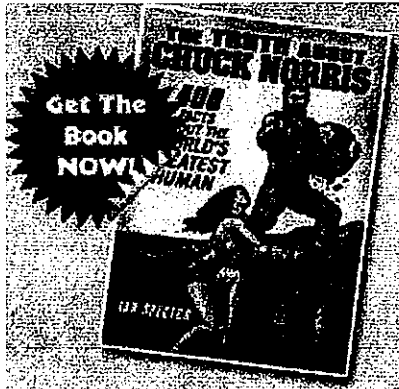
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EXHIBIT F

EXHIBIT F
EXCERPTS FROM
THE BOOK
“THE TRUTH ABOUT CHUCK NORRIS”

THE LOWDOWN ON THE TOUGHEST, SEXIEST, AND BEARBIEST MAN TO EVER STAIN THE EARTH

Since its emergence from the bowels of the Internet, the Chuck Norris Facts roundhouse kicked its way into the world's consciousness with all the vim and verve of its namesake. Singing the praises of his unequalled toughness, his mighty kicking feet, his indestructible beard, his frightening wit, and his ability to stop time by blinking about pineapples, *The Truth About Chuck Norris* is the one book Beck enough to go behind the beard and reveal the real Chuck.

Jan Spector, webmaster of the site that started the meme and survivor of a real life encounter with Chuck himself, has selected the four hundred most kick-ass facts from his library of thousands, as well as illustrations as awesome as the man himself. This death-defying volume includes such awe-inspiring observations as:

A cobra once bit Chuck Norris's leg.
 After five days of excruciating pain, the cobra died.

Chuck Norris can change a cell phone by rubbing it against his beard.

After an episode of *Walker, Texas Ranger* aired in France, the French whispered to Chuck Norris just to be certain he'd still.

Chuck Norris was the first person to team a dinosaur.

Chuck Norris once visited the Virgin Islands.
 Afterward, they were renamed the Islands.

Every piece of furniture in Chuck Norris's house is a total gym.

A must-have present to the archetypal American male and a bible of everything Chuck, *The Truth About Chuck Norris* is easily the most important book of all time.

Cover art by Stephen Wildard
 Cover design by Jan Spector

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THE TRUTH ABOUT CHUCK NORRIS

400 FACTS ABOUT THE WORLD'S GREATEST HUMAN

JAN SPECTOR



The Truth about

CHICK

NORRIS

**400 Facts
about the
WORLD'S
GREATEST
HUMAN**

Ian Spector



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To **ALL OF YOU** who kept the site alive, especially the volunteers (Mike, Brian, Eric, Rob, Alex, and everyone else) who helped to code the Web site and keep it running smoothly.

Chuck Norris got drunk and fucked the Statue of Liberty,
then bragged about it to the Lincoln Memorial.

When Chuck Norris bleeds, oak
trees sprout up from where the
blood fell.

Chuck Norris killed the pope with a roundhouse kick to
the chest after an argument over who had a better beard,
Jesus or Norris.

Chuck Norris is strong enough to punch through steel, yet
delicate enough to cradle a newborn to sleep.

Occasionally Chuck Norris will call up the Power Rangers just to say hi.

Chuck Norris eats pencils and markers for breakfast, and he shits out masterpieces.

The book of Revelation was actually written by Chuck Norris in a moment of prophecy.

Chuck Norris can fit five billiard balls in his mouth.

Chuck Norris was born of the Greek gods Ares and Hermes in a grand session of butt sex that may never be equaled.

The only person to ever beat Chuck Norris in a game of rock-paper-scissors was a Mexican astronaut that went by the alias "Eduardo the Magnificent."

If you can see Chuck Norris, he can see you. If you can't see Chuck Norris, you may be only seconds away from death.

Chuck Norris's body hair is ten times stronger than spider silk and fifty times stickier.

If you've ever met a woman with crooked teeth, you've met a woman who has given Chuck Norris a blowjob.

Chuck Norris was the Jewish Humanitarian of the Year.
(Seriously.)

Chuck Norris is just like you and me: He puts his pants on one leg at a time. Except when he puts his pants on, he fights North Koreans.

Who are Chuck Norris's parents? Might, Justice, and Cunning. Yes, all three.

Chuck Norris is considered a prime number in certain schools in Ontario.

Chuck Norris lives by only one rule: No Asian Chicks.

When Chuck Norris was denied a McGriddle at McDonald's because it was 10:35, he roundhouse kicked the store so hard it became a Wendy's.

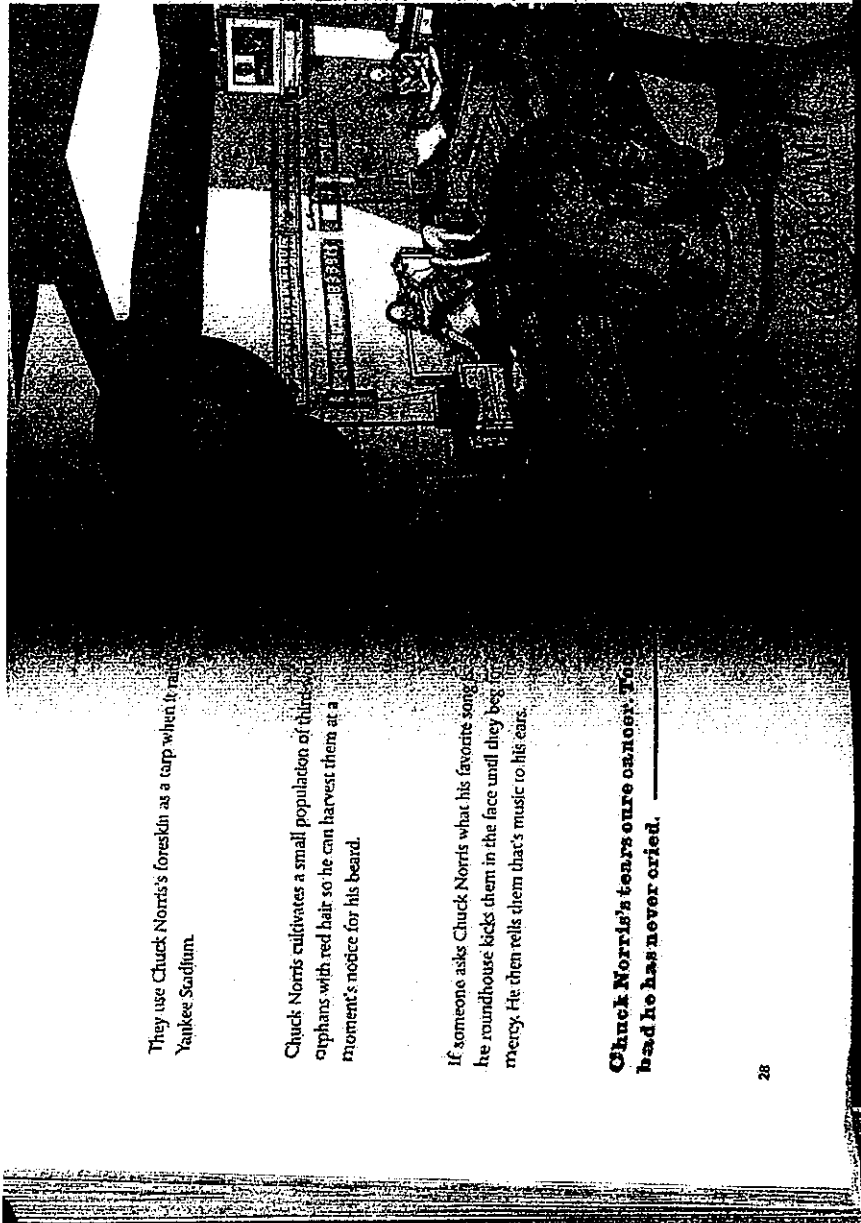
21

Chuck Norris invented babies because he got tired of eating the same old thing.

The chief export of Chuck Norris is pain.

Chuck Norris began the Church of England in 1799, back when his nickname was "England."

20



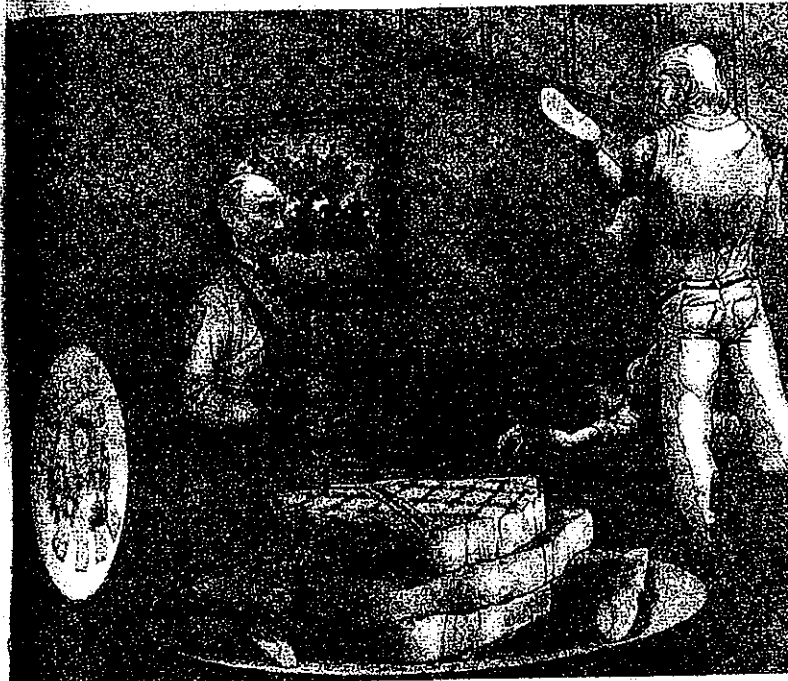
They use Chuck Norris's forehead as a tarp when it rains.
Yankee Stadium.

Chuck Norris cultivates a small population of third-class
orphans with red hair so he can harvest them at a
moment's notice for his beard.

If someone asks Chuck Norris what his favorite song is,
he roundhouse kicks them in the face until they beg for
mercy. He then tells them that's music to his ears.

**Chuck Norris's tears are as rare as a unicorn. To
had he has never cried.**

Chuck Norris once ate three seventy-two-ounce steaks in one hour. He spent the first forty-five minutes of that hour having sex with his waitress.



Chuck Norris can make your nose bleed with his mind.

Chuck Norris fucked your wife while you were out of town on a business trip. Tough shit.

Chuck Norris sold his soul to the devil for his rugged good looks and unparalleled martial-arts ability. Shortly after the transaction was finalized, Chuck roundhouse kicked the devil in the face and took his soul back. The devil, who appreciates irony, couldn't stay mad and admitted he should have seen it coming. They now play poker every second Wednesday of the month.

Chuck Norris isn't God, but he beats him in golf.

It is commonly known that Eve was created from the rib of Adam, but few know that Chuck Norris was actually created using Adam's genitals.

Chuck Norris's belly button is an "innie." Inside Chuck's belly button is an alternate universe where thousands of tiny Chuck Norrises are training to get their buddies out of a Vietcong POW camp.

Chuck Norris can grate fresh Parmesan cheese with his rust-red beard.

Chuck Norris fought Gandhi in the very first Ultimate Fighting Championship and won in less than fifteen seconds by crushing Gandhi's rib cage with a single punch. Later, officials questioned the validity of the match, as it took place in Gandhi's home, while he was asleep.

Contrary to popular belief, Chuck Norris, not the blue-ringed octopus of eastern Australia, is the most venomous creature on earth. Within three minutes of being bitten, a human being experiences the following symptoms: fever, blurred vision, beard rash, tightness of the jeans, and the feeling of being repeatedly kicked through a car windshield.

Chuck Norris swears he didn't sleep with your wife. Yes, it is strange that your children show an affinity for Texas justice and beard cultivation. No, Chuck Norris does not know why your wife can only climax when you wear a karate uniform. Chuck Norris thinks you are asking the kind of questions a person asks when they want to be roundhouse kicked in the face.

Chuck Norris drives a pickup truck upholstered in denim.

Chuck Norris took my virginity, and he will sure as hell take yours. If you're thinking to yourself, "That's impossible, I already lost my virginity," then you are dead wrong.

A man once asked Chuck Norris if his real name is "Charles." Chuck Norris did not respond, he simply stared at him until the man exploded.

The Vietnam war ended over thirty years ago. Nobody told Chuck Norris.

Alien vs. Predator is an autobiographical depiction of Chuck Norris's first sexual experience.

Chuck Norris had seven children. Four of them went on to become doctors. The other three were delicious.

A masked man once stabbed Chuck Norris in an alley behind a children's hospital. **THE KNIFE BLED TO DEATH.**

Chuck Norris once roundhouse kicked Bruce Lee, breaking him in half. The result was Jet Li and Jackie Chan.

Chuck Norris's last option is violence. It is also his only option.

Chuck Norris likes his girls like he likes his whiskey—
twelve years old and mixed up with coke.

There is no chin behind Chuck Norris's beard. There is
only another fist.

**Chuck Norris won a staring
contest with Medusa.** →

Chuck Norris solved the Bermuda triangle by using the Pythagorean theorem.

The Bible says Samson killed 15,000 Philistines with the jawbone of an ass. When God asked Chuck Norris what he thought about that, he said, "That's one way to do it." God laughed at Chuck's wisdom, and said, "I knew you were going to say that."

Chuck Norris was supposed to be the next face on Mount Rushmore. Unfortunately granite is not a hard enough material to replicate Chuck Norris's beard.

When Chuck Norris's shit hits the fan, the fan breaks.

As a teen Chuck Norris impregnated every nun in a convent tucked away in the hills of Tuscany. Nine months later the nuns gave birth to the 1972 Miami Dolphins, the only undefeated and untied team in professional football history.

Chuck Norris is so fast he can turn off his bedroom light and be under the covers before the room gets dark.

The fences at the zoo are to keep the animals safe from
Chuck Norris.

For some people, one testicle is larger than the other one.
For Chuck Norris, each testicle is larger than the other one.

Chuck Norris secretly sleeps with every woman in the
world once a month. They bleed for five days as a result.

Chuck Norris puts the **FIST** in
PACIFIST.

When Chuck Norris goes to the movies, his friends call
him "Fire!" because it is safer than saying "Chuck Norris" in
a crowd.

All ninety-nine of Jay-Z's problems are Chuck Norris.

Chuck Norris builds all the Home
Depots with his bare hands.

The term *heartburn* was invented when Chuck Norris
roundhouse kicked a man in the chest and his heart caught
fire.

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Chuck Norris slept through 9/11. His bedroom was on the
73rd floor.

The only match for Chuck Norris is the one he burns you
with.

158

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99

Acknowledgments

Very special thanks, of course, to my family. Without their continued support, you wouldn't be reading any of this.

To my friends: I'm contractually allowed only ten free copies of this book and you're not getting any of them.

Big thank-yous to Charlotte Wasserstein from WMA for getting me hooked on this book project again and walking me through the publishing process, as well as to my editor, Patrick Mulligan from Gotham, for being so enthusiastic about the project and being able to see eye to eye with me on everything.

And of course to **Chuck**: You've got an awesome sense of humor. Thanks for playing along.

**Chuck Norris doesn't sleep.
He waits.**



EXHIBIT G

EXHIBIT G

**October 24, 2007
Cease and Desist Letter**



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October 24, 2007

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Mr. Ian Spector
Brown University
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Email: ian_spector@brown.edu, ian@4q.cc

Re: CHUCK NORRIS Intellectual Properties

Dear Sirs:

We represent Carlos Ray Norris, a/k/a Chuck Norris ("Mr. Norris"), the famous actor, author and celebrity. Mr. Norris owns rights in his name, image, and related trademarks, and other intellectual properties (collectively "Norris Properties"). He has used the Norris Properties for many years in connection with his profession. Mr. Norris enjoys substantial goodwill in the Norris Properties as a result of his accomplishments and promotional efforts. Mr. Norris' name and image are known to consumers worldwide.

Among other intellectual properties, Mr. Norris owns the following federal trademark registrations and applications, as well as numerous domain names using his name and mark CHUCK NORRIS: CHUCK NORRIS (Reg. Nos. 2864474 and 2124757) in Class 41, CHUCK NORRIS FACTS (Reg. No. 3220185) in Class 35; CHUCK NORRIS FACTS (Reg. No. 3213519) in Class 35; CHUCK NORRIS IS... "THE FACT" (Reg. No. 3211054) in Class 25 and Ser. No. 78858517 in Class 41; CHUCK NORRIS APPROVED (Ser. No. 77173481) in Class 41; CHUCK NORRIS APPROVED (Ser. No. 77173465) in Classes 5, 9, 25, and 28; CHUCK NORRIS (Ser. No. 77027784) in Class 5. In addition, Mr. Norris owns substantial common law rights in marks using his name, as well as considerable publicity and privacy rights in his name and image. As a result of extensive use and the renown and goodwill



Legal Department, Gotham Books
Mr. Ian Spector
October 24, 2007
Page 2

associated with his moniker, CHUCK NORRIS is a "famous" mark as that term is used in the federal Lanham Act. Mr. Norris also is an accomplished author; he has published numerous books, both non-fiction ("Against All Odds" and "The Secret Power Within," for example) and fiction ("A Threat to Justice" and other "Justice Rider" novels, for example).

Mr. Norris recently learned that Gotham Books ("Gotham") intends to publish a book entitled "The Truth About Chuck Norris" by Ian Spector. The subtitle is: "400 Facts About the World's Greatest Human." See annexed copy of a Gotham promotional flyer for the book. We understand that this book is slated for publication on November 29, 2007.

This publication uses Mr. Norris' name in the title, "The Truth About Chuck Norris". Moreover, it appears that Mr. Norris' likeness will be featured prominently on the cover of the book. See Gotham promotional flyer. Advertising for this book now appears on well-known Internet Websites, including Amazon.com, Borders.com and BarnesandNoble.com, both in the United States and throughout the world (samples attached). We also understand that Mr. Spector registered the domain name "TruthAboutChuckNorris," which links to his "Chuck Norris Facts" webpages at 4q.cc (copies attached).

Please be advised that these unauthorized uses of Mr. Norris' name, image and persona for commercial gain constitute unlawful violations of Mr. Norris' rights of publicity and privacy as well as infringement, false representations, dilution of a famous mark, cybersquatting, and unfair competition in violation of the Lanham Act, 15 U.S.C. §§ 1114, 1125(a), 1125(c), 1125(d) and the common law. Neither Mr. Spector nor Gotham Press has ever asked for, or received, consent to use Mr. Norris' name or image in connection with this book or any other use. Although Mr. Norris knows about the fake "facts", including those posted on Mr. Spector's Web site at <http://4q.cc>, there is a significant difference between clearly mythical "facts" or parody and a book entitled "The Truth About Chuck Norris." Consumers are likely to be confused and misled by that title and believe that the book actually contains biographical facts about Mr. Norris. Gotham's reputation as a publisher of nonfiction books increases the likelihood that consumers will believe the contents of the book to be true. That likelihood is reinforced not only by the misleading title of the proposed work: "The Truth About Chuck Norris," but also by the use of Mr. Norris' name and likeness in the title and on the cover. The book may also infringe Mr. Norris' right of privacy, if it portrays Mr. Norris in a false light that is offensive and causes emotional anguish.

Your promotion and proposed sales of this book demonstrate your intent to gain financially by exploiting and misappropriating Mr. Norris' name and goodwill. Although Mr. Norris, as an author and actor, values First Amendment rights, he believes, as do we, that the proposed book goes beyond what is permissible under the First Amendment and far exceeds



Legal Department, Gotham Books
Mr. Ian Spector
October 24, 2007
Page 3

the parameters of any fair use. This is not a biography. It will not provide the "truth" about Mr. Norris, or any real "facts" about Mr. Norris. Mr. Norris' identity is not being used for newsworthy information of legitimate public concern. Instead, it is an attempt to profit commercially from the unauthorized exploitation of Mr. Norris' name, image and persona as part of a work of fiction. Although as noted Mr. Norris has known about the fake "facts" posted on Mr. Spector's website, to Mr. Norris' knowledge, Mr. Spector had not until this time attempted to profit from the unauthorized use of Mr. Norris' name, image and reputation.

Mr. Norris and the Norris Properties are likely to suffer severe and irreparable harm if this book is published. Consumers are likely to think that "The Truth About Chuck Norris" is a book that is affiliated with or approved by Chuck Norris. Confusion and tarnishment of Mr. Norris' reputation are likely to result from this unauthorized work. Indeed, we are already aware of some actual confusion concerning the sponsorship and authorization of this book. As a result of Mr. Norris' dedication and hard work, he has many loyal fans and enjoys a very positive reputation. He is very concerned that the publication of this book, and any associated collateral merchandise or publicity, is likely to cause considerable confusion and to irreparably harm his reputation and goodwill.

On behalf of Mr. Norris, we must therefore demand that you immediately: 1) cease all promotion and sales of the book entitled "The Truth About Chuck Norris" or any other unauthorized book or any other commercial products using Mr. Norris' name, image, marks, or any other of the Norris Properties; 2) cease and desist from all use of the phrase "The Truth About Chuck Norris" or other similarly misleading phrase; 3) halt all use of the domain name truthaboutchucknorris.com, and immediately transfer that domain name to Mr. Norris; 4) refrain from posting any content on the Website at <http://truthaboutchucknorris.com>, or linking that domain name to any other Websites; 5) cancel any orders placed for the proposed book "The Truth About Chuck Norris" and refund any and all deposits or money already received for that work; 6) provide us with an itemized inventory of all galleys, advertisements, collateral or any other merchandise or materials using the words "The Truth About Chuck Norris" or other similarly misleading phrase, and deliver such materials to the undersigned for destruction; and 7) provide us with an accounting of your revenues from any and all sales or promotions of products bearing any of the Norris Properties, including the selling price of each item sold and an itemization of all books or other products bearing the Norris Properties in your inventory or otherwise under your control. Any use of "The Truth About Chuck Norris" or of any of the Norris Properties for commercial purposes after receipt of this notice will be further proof of your intentional misappropriation of the Norris Properties, for which Mr. Norris can seek immediate relief, higher damages, and payment of his attorneys' fees.



Legal Department, Gotham Books
Mr. Ian Spector
October 24, 2007
Page 4

Please send us your written response to this letter before the close of business on November 5, 2007. Mr. Norris reserves all its rights, including the right to take legal action as necessary.

Sincerely,

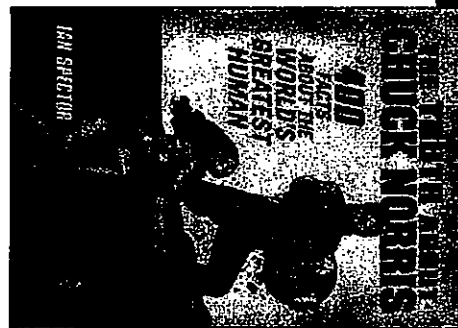

Deborah M. Lodge

Enclosures

cc: Michael S. Forshey, Esq.

EXHIBIT 1

GOTHAM PROMOTIONAL FLYER



The Truth About Chuck Norris

400 Facts About the World's Greatest Human
Ian Spector

The illustrated lowdown on the toughest, sexiest, and heartiest man to ever stalk the earth

As the star of *Walker, Texas Ranger*, movies such as *The Delta Force*, and the long-running infomercial for the Total Gym, Chuck Norris represents a separate kind of superman—a hero of hilarious proportions. In recent years, farcical facts about Norris began cropping up on the Internet and across the airwaves, finally reaching their peak on one comprehensive Web site. Created by college student Ian Spector before he was even twenty, the Chuck Norris Fact Generator attracted as many as 18 million hits a month. Now the best of Spector's site is available in one affordable, death-defying volume, featuring such awe-inspiring observations as:

- A cobra once bit Chuck Norris's leg. After five days of excruciating pain, the cobra died.
- Chuck Norris can charge a cell phone by rubbing it against his beard.
- Chuck Norris was the first person to tame a dinosaur.
- Chuck Norris once visited the Virgin Islands. Afterward, they were renamed the islands.

The latest addition to the booming genre of "fratire," and featuring vivid cartoons by the same illustrator behind *The Alphabet of Manliness*, there's no bawrier, beefier gift than *The Truth About Chuck Norris*.

- Ian Spector's Web site attracts millions of visitors—its peak was nearly 20 million page views per month.
- The site will be newly designed in time for publication.
- Ian Spector has been interviewed by *The Washington Post* and has appeared on ABC's *Mophine* and dozens of radio stations, and he has survived an encounter with Chuck Norris himself.
- The "fratire" genre is a fast-growing market: Books such as *The Alphabet of Manliness* have hit the bestseller lists.

IAN SPECTOR is a sophomore at Brown University, where he studies neuroscience and edits the campus humor magazine. He has been widely interviewed by media outlets ranging from *The Washington Post* to *Mophine*. A survivor of a real-life encounter with Chuck Norris himself, Spector divides his time between school in Providence, Rhode Island, and home on Long Island.

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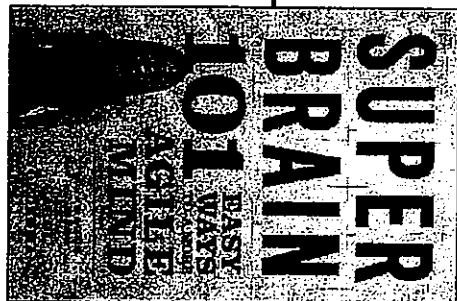
In the ultimate brain fitness handbook, international Sudoku expert Carol Vorderman brings her proven and addictive mental workouts to everyone seeking a sharper memory and better concentration skills.

Like the rest of your body, your brain responds to a good workout. Yet few of us take time for mental gymnastics. The result? It becomes hard to put a name to a face, or simple math becomes next to impossible, or you find your mind wandering, especially unable to focus in the afternoon. Maybe you even experience premature short-term memory loss, walking into a room without remembering what your task there was. It doesn't have to be this way: these symptoms shouldn't be passed off as unavoidable. *Super Brain* offers a fun yet effective way to stave off mental decline, bringing astounding new levels of brain power to readers of all ages.

One of the highest-paid women in Britain, Carol Vorderman amazes her UK television viewers by regularly carrying out fast and accurate mathematical calculations on the air. *Super Brain* now reveals the tricks of her trade, with practical exercises that can strengthen anyone's intellectual prowess. With dozens of puzzles and teasers that stimulate the gray matter, this "brain gym" opens the mind to new ways of thinking and improves concentration, memory, and creativity. Vorderman also offers essential advice on lifestyle habits to improve brain fitness, including tips on physical exercise, sleep, and nutrition.

- Perfect for New Year, New You promotions.
- Fully Americanized, with Carol Vorderman writing a new introduction for her American audience. There will also be a new forward for the U.S. edition.
- Vorderman's Sudoku books have sold millions of copies in the UK and the United States and they continue to sell.
- Written for readers of all ages and levels.

CAROL VORDERMAN is Britain's leading female television host. For twenty years she has been known as the "Numbers Queen" on the hit UK quiz show *Countdown*, where she performs mental arithmetic at lightning speed. Carol is an international Sudoku expert, whose Sudoku puzzle books have sold millions of copies worldwide. She holds a degree from Cambridge and is a member of Mensa, with an IQ of 164. She lives in Central London.



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The lowdown on the toughest, sexiest, and beardiest man to ever stalk the earth

Since its emergence from the bowels of the Internet, the Chuck Norris Fact has roundhouse kicked its way into the world's consciousness with all the vim and verve of its namesake. Singing the praises of his unequalled toughness, his mighty kicking feet, his indestructible beard, his frightening virility, and his ability to stop time by thinking about pineapples, *The Truth About Chuck Norris* is the one book brave enough to go behind the beard and reveal the real Chuck.

Ian Spector, webmaster of the site which started the meme and survivor of a real-life encounter with Chuck himself, has selected the 400 most kick-ass facts from his library of thousands, as well as illustrations as awesome as the man himself. This death-defying volume includes such awe-inspiring observations as:

- A cobra once bit Chuck Norris's leg. After five days of excruciating pain, the cobra died.
- Chuck Norris can charge a cell phone by rubbing it against his beard.
- When an episode of "Walker, Texas Ranger" aired in France, the French surrendered to Chuck Norris just to be on the safe side.
- Chuck Norris was the first person to tame a dinosaur.
- Chuck Norris once visited The Virgin Islands. Afterward, they were renamed The Islands.
- Every piece of furniture in Chuck Norris's house is a Total Gym.

A must-have paean to the archetypal American male and a bible of all things Chuck, *The Truth About Chuck Norris* is easily the most important book of all time.

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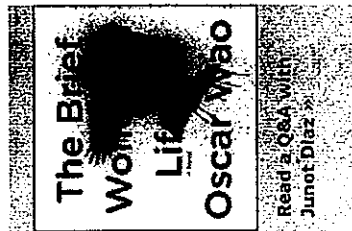
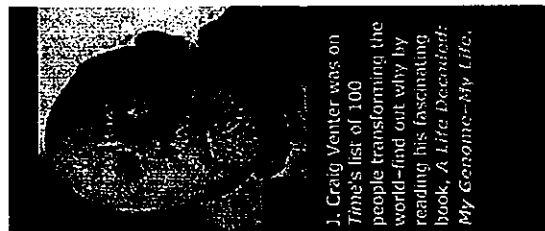
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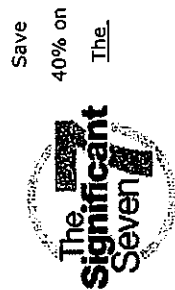
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von Ian Spector von Gotham

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Bibliographic Data: Trade Paperback, 176 Pages, Penguin Group (USA) Incorporated, November 2007

Author: Spector, Ian

List Price: \$12.00

In-store prices may vary. See your local store for the most up-to-date pricing.

Status: Not Yet Published

BINC: 9003019

ISBN: 1592403441

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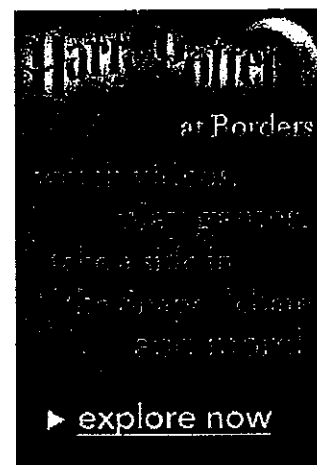
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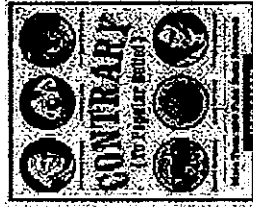
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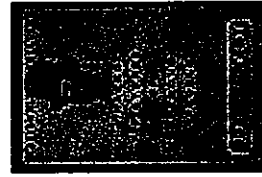
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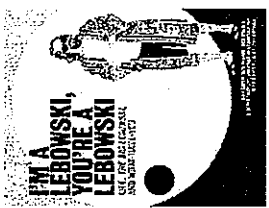
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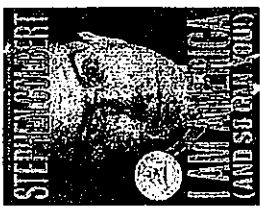
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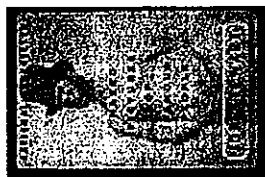
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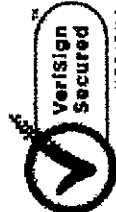
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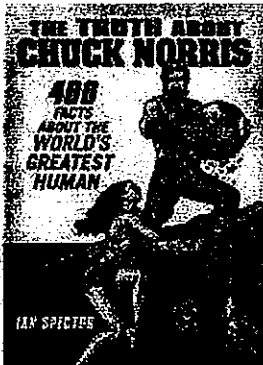
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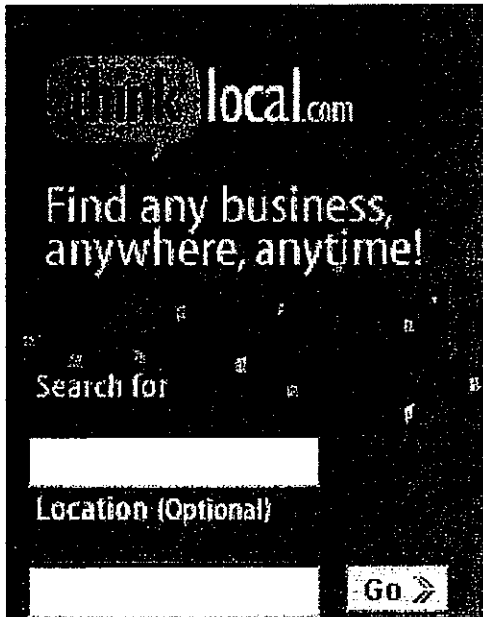
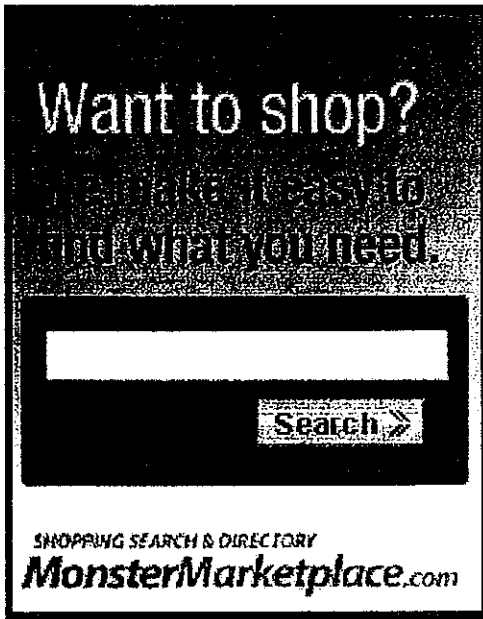
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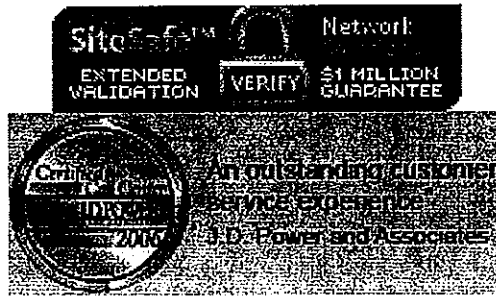
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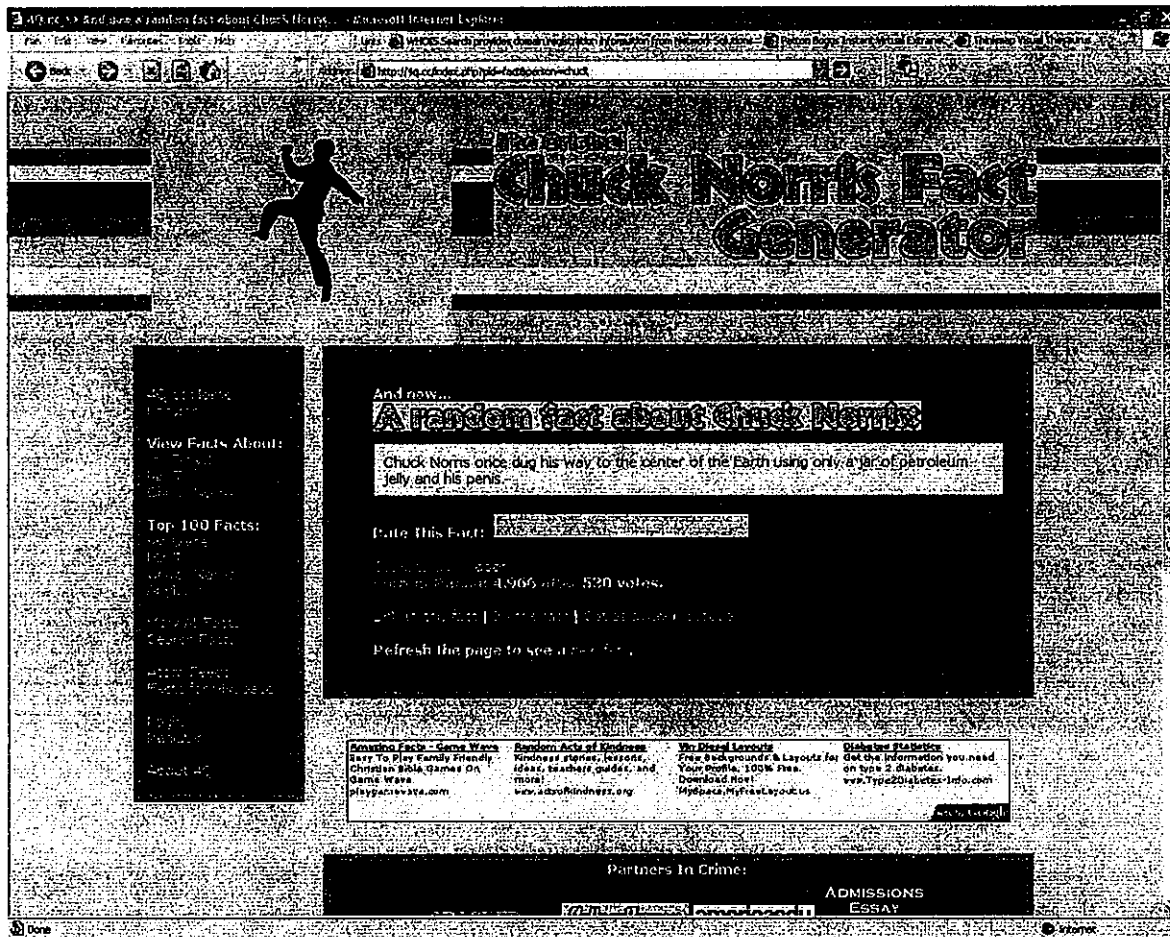
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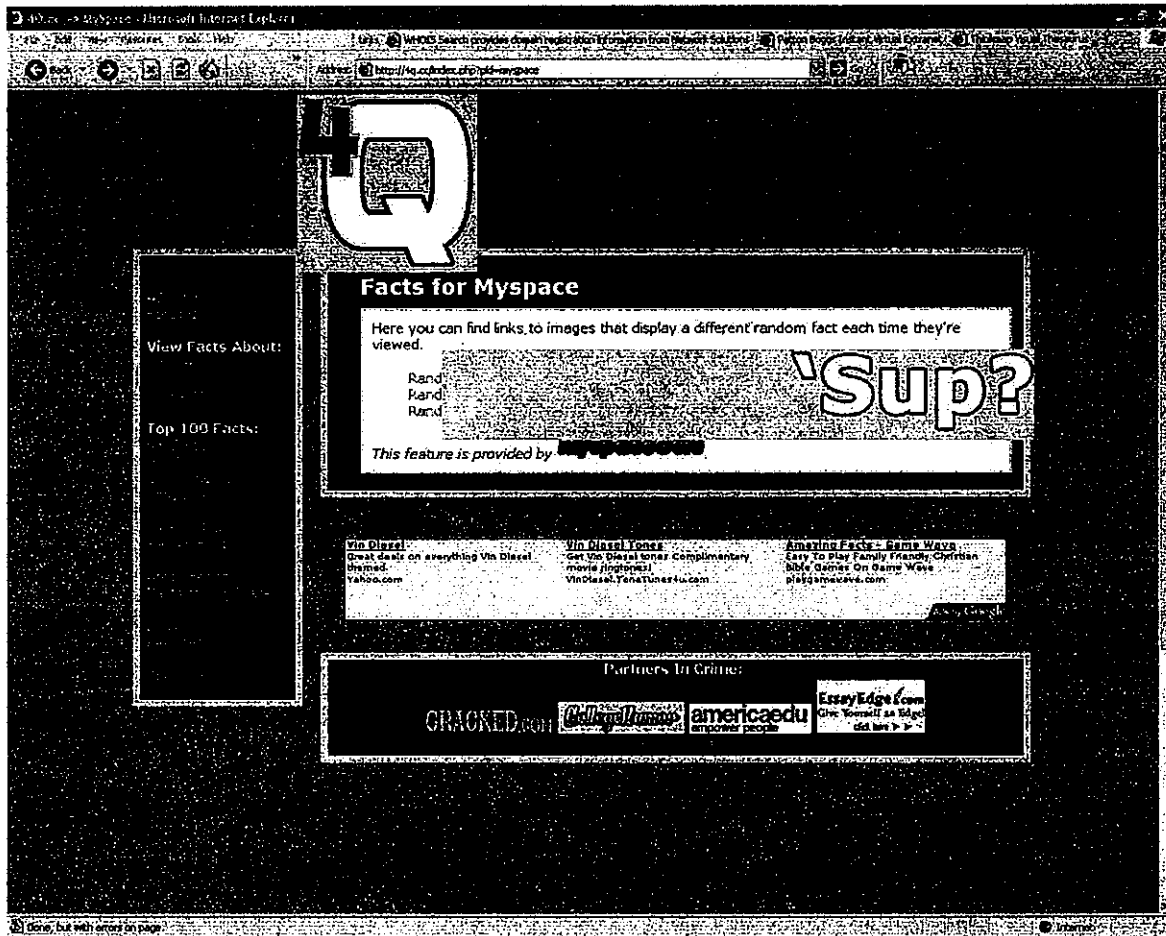
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EXHIBIT 4

SAMPLE PAGES FROM MR. SPECTOR'S 4q.cc WEBSITE





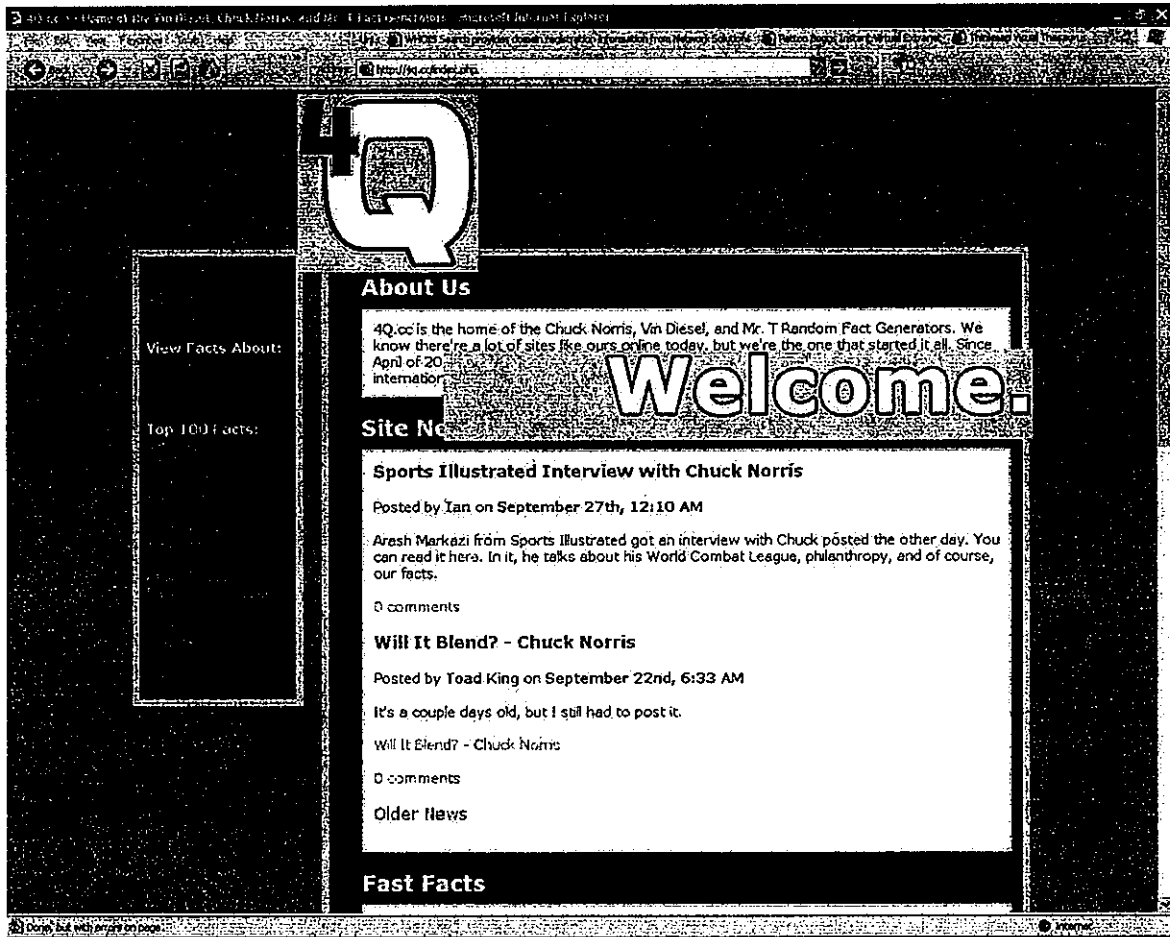


EXHIBIT H

EXHIBIT H

**Penguin's October 26, 2007 Response to
Cease and Desist Letter**



Penguin Group (USA)

375 Hudson Street, New York, NY 10014-3658
Telephone (212) 366 2959 Fax (212) 366 2867 alex.gigante@us.penguin-group.com

Alexander Gigante
SENIOR VICE PRESIDENT
LEGAL AFFAIRS / CORPORATE COUNSEL

October 26, 2007

VIA FEDEX

Deborah M. Lodge, Esq.
Patton Boggs LLP
2550 M Street, NW
Washington, D.C. 20037-1350

Re: *The Truth About Chuck Norris* by Ian Spector

Dear Ms. Lodge:

I am replying to your October 24, 2007 letter, which asserts that the above-referenced work (the "Work"), published by the Gotham Books division of Penguin Group (USA) Inc. ("PGI"), violates Chuck Norris's rights of publicity and privacy, various Lanham Act rights and other rights under common law. All these claims are absurd.

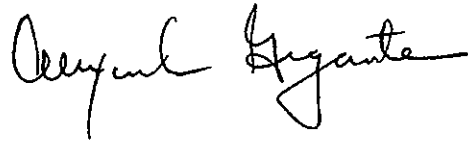
The Work's cover art and copy, and interior art and text, leave no doubt that it is a puerilely humorous spoof and parody of Chuck Norris as a social and cultural phenomenon. The First Amendment unqualifiedly protects this kind of transformative use of Mr. Norris's celebrity from legal claims of whatever character, whether advanced under the rubric of rights of publicity and privacy, the Lanham Act or otherwise. See, e.g., *ETW Corp. v. Jireh Publishing, Inc.*, 332 F.3d 915 (6th Cir. 2003) (unauthorized print featuring Tiger Woods did not violate his right of publicity or Lanham Act rights); *Hoffman v. Capital Cities/ABC, Inc.*, 255 F.3d 1180 (9th Cir. 2001) (humorous mock-up of movie still did not violate Dustin Hoffman's right of publicity); *Cardtoons, L.C. v. Major League Baseball Players Ass'n*, 95 F.3d 959 (10th Cir. 1996) (parody baseball cards did not violate players' rights of publicity or licensing rights of the Player's

Deborah M. Lodge, Esq.
October 26, 2007
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Association under the Lanham Act) ("Parodies of celebrities are an especially valuable means of expression because of the role celebrities play in modern society"); *Winter v. D.C. Comics*, 30 Cal.4th 881, 69 P.3d 473 (2003) (parody comic book using images of the Winter brothers did not violate their rights of publicity).

PGI therefore rejects Mr. Norris's claims and refuses to accede to the demands in your letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond Gigante". The signature is fluid and cursive, with the first name "Raymond" and last name "Gigante" clearly distinguishable.

AG/slf

cc: Mr. Ian Spector

EXHIBIT I

EXHIBIT I

November 16, 2007
Letter to Penguin



2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-6315
www.pattonboggs.com

November 16, 2007

Deborah M. Lodge
202-457-6030
dlodge@pattonboggs.com

**VIA EMAIL: alex.gigante@us.penguinigroup.com
AND FIRST CLASS MAIL**

Mr. Alexander Gigante
Senior Vice President
Legal Affairs / Corporate Counsel
Penguin Group
375 Hudson Street,
New York, NY 10014-3658

Re: Chuck Norris Infringement – "The Truth About Chuck Norris"

Dear Mr. Gigante:

This letter responds to your October 26, 2007 letter, in which you informed us that Penguin Group (USA) Inc. ("PGI") would not change its decision to publish the above-referenced work. Rather, you flatly rejected Chuck Norris' complaint about the grossly misleading title and the book's direct and unequivocal infringement of his intellectual property rights, including his right to control the use of his name and image in commercial endeavors. Your letter asserts that the First Amendment "unqualifiedly protects" PGI "from legal claims of whatever character." We have carefully considered your parody defense and find it without merit.

PGI simply cannot misappropriate Chuck Norris' image and name, and evade the obligation to obtain Mr. Norris' consent merely by characterizing this book as a "parody". See *Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569 (1994) ("suggestion that any parodic use is presumptively fair has no more justification in law or fact than the equally hopeful claim that any use for news reporting should be presumed fair."); *Grant v. Esquire, Inc.*, 367 F. Supp. 876, 883 (S.D.N.Y. 1973) (finding infringement of publicity rights, noting that "if the publisher feels impelled to trade upon the name and reputation of a celebrity, it must pay the going rate for such benefit").

The cases you rely on for PGI's parody defense are easily distinguishable from your publication of a book entitled "The Truth About Chuck Norris" that posits "facts" with no truthful or factual basis. For example, unlike the painting in *ETW Corp.* that depicted an actual historical event involving Tiger Woods, this book is pure fiction. Unlike the works at issue in *Cardtoons* and *Winter*, this book prominently features the famous "Chuck Norris" name without "transforming" it into something "other than his likeness." *Hoffman*, another case you cite, does not address parody at all. In any event, parody also does not excuse



Mr. Alexander Gigante

November 16, 2007

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trademark infringement that is likely to cause considerable confusion among Chuck Norris fans, or the "cybersquatting" occasioned by the registration of the domain name featuring Mr. Norris' name (truthaboutchucknorris.com), or the blatant violation of his privacy and publicity rights. The First Amendment does not give PGI free rein to exploit Mr. Norris' name and likeness for its own profit, to the harm and diminishment of Mr. Norris' rights to control the commercial use of his name and image.

Mr. Norris also is concerned that the book may conflict with his personal values and thereby tarnish his image and cause him significant personal embarrassment due to the unauthorized association. Mr. Norris is known as an upright citizen to whom God, country and values are of paramount importance-- certainly a rarity among celebrities these days. Our concern stems from a recent interview in the Brown Daily Herald, in which Ian Spector suggests that the book's content includes "really vulgar" or "hard-core" items: (copy attached):

"I knew I didn't want to include too many vulgar things involving genitalia or infants," Spector said. "Anything that is really vulgar or hard-core probably wasn't approved by me. But if that's what [PGI] think will sell, it's fine by me."

To permit us to ascertain whether the associations with Mr. Norris will indeed be "vulgar or hard-core," we ask that you send us an advance copy of the book for our review. It is possible that, depending on the material, Mr. Norris would be willing to discuss a possible resolution of this matter. Otherwise, our client will be forced to conclude that PGI's insistence in continuing to publish the book evidences its deliberate and calculated intent to infringe on and misappropriate Mr. Norris' well-established goodwill.

Please reply by November 21, 2007, hopefully with your written confirmation that PGI has altered its position and will halt the publication of this ill-advised exploitation of Mr. Norris' image and rights. As I never received any reply from Mr. Spector in response to my October 24, 2007 letter, we must conclude that he will continue to recklessly disregard and willfully violate Mr. Norris' rights.

Sincerely,

A handwritten signature in dark ink, appearing to read "Deborah M. Lodge", with a long, sweeping horizontal line extending to the right.
Deborah M. Lodge

Attachments

cc: Michael S. Forshey, Esq.
Mr. Ian Spector

[< Back](#) | [Home](#)



"Chuck Norris Fact Generator" creator Ian Spector '09 is releasing a book of the "facts."

Chuck Norris to roundhouse kick bookstores this month

By: Nick Werle

Posted: 11/7/07

Ian Spector '09 is not a fan of Chuck Norris, the fetishized action star who has been the subject of thousands of jokes over the last few years.

"I haven't to date seen any movie with him except for Dodgeball," Spector said. "But that doesn't really count."

For most people, it might not be notable to have never seen an episode of "Walker, Texas Ranger," but Spector is the creator of the famous Web site "Chuck Norris Random Fact Generator," and is releasing a book, "The Truth About Chuck Norris: 400 Facts About the World's Greatest Human," Nov. 29 that includes the best "facts" from his database.

Though several imitations have sprung up on the Web, peddling jokes about Chuck Norris' virility and fighting skills, Spector's is widely acknowledged as the first. Indeed, he has been featured in numerous newspapers and on television shows including "Nightline" and a VH1 special on Internet superstars.

"I don't want to be branded as an Internet superstar, but I was number (29)out of 40," he said. At the site's peak, during the winter of 2005-2006, it was pulling in 18 million hits per month, he said.

Publishers first approached Spector during the spring of 2006, when the site was very popular. Though he turned them down then, he was later persuaded to write a book of the site's best "facts" when the William Morris Agency approached him that summer. Eventually, he began working with Gotham Books, a division of the Penguin Group, and is no longer represented by the William Morris Agency.

Spector said he actually wrote the manuscript in one night. He started writing around 10 p.m. one November night and finished at about 8 a.m. the next morning. Originally, he was told to pick 250 of the best facts from the Web site, but the project soon ballooned to include 400 of the site's jokes.

"I knew I didn't want to include too many vulgar things involving genitalia or infants," Spector said. "Anything that is really vulgar or hard-core probably wasn't approved by me. But if that's what they think will sell, it's fine by me."

Though Spector does not have the same fascination with Norris that may be shared by many of his site's visitors, he did get to meet the man himself in January 2006 at the invitation of the action star's wife. Norris is not affiliated with the Web site or the book.

Because most of the book's content came directly from his Web site, Spector said he is unsure whether he should be considered a bona fide author. "People say now that I'm considered an author because I wrote a 20-page intro that got cut down to eight pages and copied and pasted a bunch of stuff off of my Web site," he said. "That makes me an author? That's not what I think of when I think of an author."

In addition to the jokes, Spector's book features illustrations by Angelo Vildasol, who had previously worked on a book by the Internet-humor fixture Maddox. Spector recounted how the elusive Vildasol, who lives in Colorado, would e-mail him with updates on the project at 6 a.m. some days. The two have never met in person.

The site relies on visitor-submitted jokes to populate the "fact generator." During its peak, Spector said the site received thousands of submissions a day. Though he couldn't say how many of the jokes he wrote himself, he stressed that he - along with a few friends who helped him run the site when it was at its greatest popularity - had to rewrite most of the submissions to make sure they were actually funny. This attention was likely responsible for the site's popularity, he said.

"As it was progressing, there was a lot of quality control. Our acceptance rate was about 5 percent," he said.

J.P. Reader, a bookseller at the Brown Bookstore, also cited the surprisingly high quality of the humor as the reason for the site's fame. "I was surprised because I don't usually find pop culture references funny," he said. "I haven't looked at it in about four months but it was definitely a work-stopper. ... There are some Chuck Norris things that were actually subtle even though they are absurd claims."

So if none of the "facts" are actually true, then why a "fact generator" about Chuck Norris?

"Weird obsession pretty much nails it," Spector said. "There's something about the obscurity of him that people find funny."

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EXHIBIT J

EXHIBIT J

November 16, 2007
Penguin Response

Lodge, Deborah

From: Gigante, Alex [Alex.Gigante@us.penguinroup.com]
Sent: Friday, November 16, 2007 3:59 PM
To: Lodge, Deborah
Cc: Forshey, Michael; ian@4q.cc
Subject: RE: Chuck Norris Infringement - "The Truth About Chuck Norris"

No need to wait until November 21. Our position is as stated in my October 26, 2007. Nothing in your response requires Penguin to change its position. The law is clear, and any legal action by Mr. Norris would be frivolous.

-----Original Message-----

From: Lodge, Deborah [mailto:DLodge@pattonboggs.com]
Sent: Friday, November 16, 2007 3:55 PM
To: Gigante, Alex
Cc: Forshey, Michael; ian@4q.cc
Subject: Chuck Norris Infringement - "The Truth About Chuck Norris"

> Dear Mr. Gigante:
>
> Annexed please find our response to your October 26, 2007 letter.
> Please contact me if you have any questions.
>
> Regards,
>
> Deborah M. Lodge
>
Deborah M. Lodge
Patton Boggs LLP
2550 M Street, N.W.
Washington, DC 20037
(202) 457-6030 (Phone)
(202) 457-6315 (Fax)
dlodge@pattonboggs.com

> <<gigante ltr.pdf>>

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